TSD File Inventory Index

Date: Jaril 26, 2006
Initial: Marches

Facility Name: Aston Chemical Suc [Effeyl	Petroleum Additives - Ore Felde Lite	$\left(\frac{1}{2} \right)$
Facility Identification Number: $/LD$	055 	871370	
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	N	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	C.1 Compliance - (Inspection Reports)	V
.3 Part A Application and Amendments	1	C.2 Compliance/Enforcement	$\sqrt{1}$
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	1
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	1
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	-
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	-
B.1 Administrative Record		.4 RFI Draft /Final ⊼∈port	
		5. RFI QAPP	1

Tell -1

.6 RFI QAPP Correspondence	.8 Progress Reports
.7 Lab Data, Soil-Sampling/Groundwater	D.5 Corrective Action/Enforcement
.8 RFI Progress Reports	.1 Administrative Record 3008(h) Order
.9 Interim Measures Correspondence	.2 Other Non-AR Documents
.10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations
D.3 Corrective Action/Remediation Study	.1 Forms/Checklists
.1 CMS Correspondence	E. Boilers and Industrial Furnaces (BIF)
.2 Interim Measures	.1 Correspondence
.3 CMS Workplan	.2 Reports
.4 CMS Draft/Final Report	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)
.5 Stabilization	G.1 Risk Assessment
.6 CMS Progress Reports	.1 Human/Ecological Assessment
.7 Lab Data, Soil-Sampling/Groundwater	.2 Compliance and Enforcement
D.4 Corrective Action Remediation Implementation	.3 Enforcement Confidential
.1 CMI Correspondence	.4 Ecological - Administrative Record
.2 CMI Workplan	.5 Permitting
.3 CMI Program Reports and Dversight	.6 Corrective Action Remediation Study
.4 CMI Draft/Final Reports	.7 Corrective Action/Remediation Implementation
.5 CMI QAPP	.8 Endangered Species Act
.6 CMI QAPP Correspondence	.9 Environmental Justice
1 Las Data - dei Samping/Kersundir die	

Note: Transmittal Lett	er to Be	Included	with Reports.
Comments:	udu	1 site	<u> </u>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WIND RECORD OFFICE

77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

NOV 22 1915

REPLY TO THE ATTENTION OF:

November 14, 1995

ETHYL PETROLEUM ADDITIVES INC ATTN EDWARD COX 501 MONSANTO AVE SAUGET IL 62201

RE: US EPA ID Number	ILD 055	5 871 370	_	
Location:	501 MON	NSANTO AVE	_	
	SAUGET	IL 62201	·	
In response to your corresp	ondence o	october	25, 1995	, the following
information has been update	ed:			
LOCATION OF INSTALLATION INSTALLATION CONTACT TO INSTALLATION LEGAL OWNER		501 MONSAN EDWARD COX		
ADDRESS		330 S FOUR PO BOX 218 RICHMOND V	9	
ADDITION OF WASTE CODE		D022 D039	D040 P120	

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon

RCRA Notifications Coordinator

Waste Management Division

cc: State Agency

File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 RCRA ACTIVITIES P.O. BOX A3587 CHICAGO, ILLINOIS 60690

DEC 0 6 1991,

ETHYL PETROLEUM ADDITIVES INC ATTN: PARKS, DONNA MONSANTO AVE SAUGET, IL 62201

RE: EPA ID #:ILD055871370		
In response to your request of	103091	the following
information has been updated:		
Generator status to	LARGE MARKET OR BURN HAZARDO	
Addition of waste code	FUEL/GEN MARKETING TO BURN F002 F003 F0C5	ER

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

Sharon Kiddon

RCRA Notifications Coordinator Waste Management Division

Sham Kadan

State Agency cc:

File

JUL 0 9 1991



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 RCRA ACTIVITIES P.O. BOX A3587 CHICAGO, ILLINOIS 60690



ETHYL PETROLEUM ATTN; DONNA PARKS MONSANTO AVE SAUGET IL 62201

RE: EPA ID #:ILD055871370		
In response to your request of	6/4/91	the following
information has been updated:		
Installation contact to Addition of waste codes	DONNA PARKS D005, D018, D002 &	D000

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

Sharon Kiddon

RCRA Notifications Coordinator

Waste Management Division

Sham Riddon

cc: State Agency

File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 RCRA ACTIVITIES P.O. BOX A3587 CHICAGO, ILLINOIS 60690

Cuttri Abams D.E. MCR Ethyl Petroleum Additions Inc Monsanto Aug Sauget 1 II 62281

1/18, 1990

RE:	EPA ID #	: ILD 05587	1370		
In r	esponse t	o your request of	11/89	the fol	llowing information
hac	been unda	tod.	, -		

Added: Hayandons code FXXZ, U189, U181

Marketor Burn Hazardons waste Fuel

Generator Marketing to Burner

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

Arthur S. Kawatachi, Information Section RCRA Program Management Branch

va achi

cc: State Agency File ~

WE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 RCRA ACTIVITIES P.O. BOX A3587 CHICAGO, ILLINOIS 60690

DF ADAMS PLT MGR
ETHYL PETROLEUM ADDITIVES INC
MONSANTO AVE
SAUGET IL G2201

RE: EPA ID #: 1LD 055871370

In response to your request of AUG 11 1988 the following information

has been updated:

CONTACT! ADAMS. DF PLT MAR

wa ami

ADDED WASTE CODES! U031 P 120

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely.

Arthur S. Kawatachi Information Section

RCRA Program Management Branch

cc: State Agency File Please refer to Section V. Line-by-Line instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of Regulated Waste Activity

(For Official Use Only MAY 1 4 2002

United States Environmental Protection Agency

. Installation's EPA ID														1000	THE REAL PROPERTY.						
	Number	(Mark	'X' in	the a	appr	opria	te box)	,												MEN	
A. Initial Notifica	ation						ficatio	n									Night	nber		EGIC	ב פונ
			(C	ompi	ete i	tem C	<i>?)</i>			I	- 0	0) 5	5	6	3		1	3	7 0	2
I. Name of Installation	(Include	e comp	any a	nd s	peci	fic sit	e name	9)	>												
THYL	10	E 7	R	0	4	E	um	2	A	0	0:	I	TI	= 1	1	E	5		I	N	C.
II. Location of Installa	tion <i>(Ph)</i>	ysical	addre.	ss no	ot P.	O. Bo	x or Re	oute i	Numb	er)											
Street																					
501 m	ONG	5 A	N	7	0		AV	E	N	U	E				17	3	E	1	P	n no	1
Street (Continued)																7	5	(13)	1	1 1	Š
															T	11	1	tav	4	20	00
City or Town											State		Zlp C	ode			- 41	1111	1	2 60	UE
SAUGE.	T										I	-	6-	2 7	2	0	1	K	LUP	US	ROO
County Code County	Name											_					3	E.M	A - I	REGI	DN F
57.	C	CA	- I	R				T	T			1			T						
V. Installation Mailing	Addres	ss (Sec	instr	uctio	nns)																
Street or P.O. Box		_																		~>	
SAME								T	T			T		1	T						T
City or Town			i					1			State	1	Zip (ode:	_		-				_
			T					T	1			+		.	T						1
V 11-11-11-11-11-11-11-11-11-11-11-11-1	1 (2								N. 10.		4.1	4									
V. Installation Contac	t (Perso.	n to be	CON	acteo	d reg	ardır	ig was		_	s at s	ite)	_		-		-		-			
Name (Last)							1	-	First)				10	1	1	-			1		
COX								E		W		-	0	1							
Job Title	0 1		- 10	1.0				1	hone	1 . 1	ber (A	rea	-0.		d Nu	mbe	(19	وسب	To	1	
7.5	DV.	25		K				6	> 1	8		>	0	3 .		/	0	/	8		
VI. Installation Conta					ons)	2					-			-							
Location Mailing	B. Stree	et or P.	O. Bo	X	_																
												1	1	-	-				1		
X																					
			_								State	9	Zip (Code							
			1								State	9	Zip (Code				 -			
City or Town	estruction	ons)									State	Э	Zip (Code				-			
City or Town VII. Ownership (See in		l Owne	_								State	9	Zip (Code				-			
City or Town VII. Ownership (See in		I Owne	_	0	R	A	TI		» N		State	9	Zip (Code							
City or Town VII. Ownership (See in A. Name of Installation ETHYL	n's Legal	O K	_	0	R	A	TI		·N	,	State	9	Zip (Code				-			
City or Town VII. Ownership (See in A. Name of Installation	n's Legal	O K	2 10	0	R	A	7 7		N		State	Э	Zip (Code							
City or Town VII. Ownership (See in A. Name of Installation ETMY Street, P.O. Box, or Re	n's Legal	O K	2 10	0	R	A	7 7			(State		Zip (
City or Town VII. Ownership (See in A. Name of Installation ETHYL Street, P.O. Box, or Re 3 3 0 5,	n's Legal	O K	2 10	0	R	A	7 7 5			6	7 State		Zip (1	7		2		5
City or Town VII. Ownership (See in A. Name of Installation ET HY L Street, P.O. Box, or Re 3 3 0 5, City or Town R I C H M	C oute Num	O K	2 p	0	R		T J	TR	26	(C)	7 State		Zip (2)	Code 3	2)	7	- Ionth		Chang	
City or Town VII. Ownership (See in A. Name of Installation ET HY L Street, P.O. Box, or Re 3 3 0 5, City or Town	C oute Num	O K	2 p	1	R			TR	26		State		Zip (Code 3	2 2) / / / /	7	-		Chang	
City or Town VII. Ownership (See in A. Name of Installation ET HY L Street, P.O. Box, or Re 3 3 0 5, City or Town R I C H M	oute Nun C C C C C C C C C C C C C	O K	2 P	1	R		Land Ty	TR	C. Ow	ner Ty	State	D. (Zip (2)	Code 3	2 2						ed Year

		ID - For Offici	al Use Only				
VIII. Type of Regulated Waste Activity (Mark	k 'X' in the appropriate boxes. Refer to	n Instructions)					
A. Hazardous Was	ste Activities	C. Used Oil N	lanagement Activities				
1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (220-2,200 lbs.) c. Less than 100 kg/mo (220 lbs) 2. Transporter (Indicate Mode in boxes 1-5 below) a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Rail 3. Highway 4. Water 5. Other - specify	 □ 3. Treater, Storer, Disposer installation) Note: A permit required for this activity, instructions. 4. Exempt Boiler and/or Indust Furnace □ a. Smelting, Melting, and Refing Furnace Exemption □ b. Small Quantity On-Site Bur Exemption □ 5. Underground Injection Contract 	t is see	porter fer Facility I Processor/Re-refiner - Type(s) of Activity(ies) ssor				
Large Quantity Handler of Universal Was							
IX. Description of Hazardous Wastes (Use 1. Listed Hazardous Wastes. (See 40 CFR)		ed to list more than 12 i	vaste codes.)				
1 F002 F003 7 8	3 4 P005 U18 9 10	5	12				
B. Characteristics of Nonlisted Hazardous nonlisted hazardous wastes your installation to list more than 4 toxicity characteristic was	on handles; See 40 CFR Parts 261.20 · vaste codes.)	- 261.24; See instruction	s if you need				
1. Ignitable 2. Corrosive 3. Reactive 4. Toxicity (D001) (D002) (D003) Characteristic	0005 000	9 0021	0022				
C. Other Wastes. (State-regulated or other							
1039 0040	0018	5	6				
X. Certification							
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.							
submitting talse information, including the po	ssibility of fine and imprisonment for						
Signature	Name and Official Title (Type	or print)	Date Signed				
Signature Glock M. Uf	ssibility of fine and imprisonment for	or print)	Date Signed S/10/02				
	Name and Official Title (Type	or print)	3 -				

Please refer to the *instructions* for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act)

& EPA

Notification of Regulated Waste Activity

Date Received (For Official Use Only)

OCT 2 5 1995

of the Resource Conservation and Recovery Act).	United States E		Notection		v				
I. Installation's EPA ID Number (Mark '		-							v
	bsequent Notific	ation			. Installation	,			
	mplete item C)		[피스	-[0]	055	8 7	1 3	70	
II. Name of Installation (Include compa	ny and specific	site name)							
ETHYL PETR	0 L E U	$m \times$	100	IT	ブレル	5 5	エノ	NC.	
III. Location of Installation (Physical ac	ldress not P.O. E	Box or Route	Number)					1900	
Street		ماسام	7 / / -	1-'-1					\dashv
5 0 1 M 0 N 5 A A Street (continued)	1/10	4 VE	UME	<u> </u>		<u> </u>			
RAVAS IVA VA	TUTAL T								
City or Town	JAKA J	1. 1	Sta	ite 7	IP Code		ome-une-monante		
SAUGET			I		71 - 1	01	_		_
County Code County Name	! 1				-				-
5 T. C L A Z	-R			1 1					
IV. Installation Mailing Address (See In									
1		in the state of th							
Street or P.O. Box				П					
 		111	1	ate 7					*******
City or Town			1 3	1	ZIP Code				-
					100		_		
V. Installation Contact (Person to be	ontacted regard			site)			(#4) <u>.</u>		lei,
Name (last)		(flrs)	4						
GOXIIIIII			OWA	KK					
Job Title	_ _ _ _				code and nu	imber)		1	
ENV. AOVZSO		6	181-	5	8 3 -	/ 0	1/8		Alaester -
VI. Installation Contact Address (See				Ž.			uii		e
A. Contact Address B. Street or P.O. Location Mailing	Вох								(
X		<u> </u>							
City or Town			s	tate	ZIP Code				
							<u> </u>		·
VII. Ownership (See instructions)									
A. Name of Installation's Legal Owne	ŗ		·····						
ETHYL COR.	PORA	TIO	N						
Street, P.O. Box, or Route Number	<u></u>	1 1	1			·		<u> </u>	
	URTH	57	REC	コカ	00	IXI	21	89	Т
City or Town	<u>" " " " " " " " " " </u>			tate	ZIP Code	1		<u> </u>	1
RICHMOND	:	1 1	,,	14	232	1/17	- 2	15	8
1, 1-1-1,1,1,10,1,10,1			! ']] /			
,	R	and Type	. Owner Tvr	e D.C	hange of Ow	ner	(Date Ch	anged)	
Phone Number (area code and numbe		Land Type C	. Owner Typ	e D.C	hange of Ow Indicator		(Date Ch	nanged) Day Ye	ear

EPA Form 8700-12 (01-90) Previous edition is obsolete.

Continue on reverse

39

Please print or type with ELITE type (12 charact	ers per inch) in the unshaded areas	only	GSA No. 0246-EPA-OT
	Meleted		ID - For Official Use Only
VIII. Type of Regulated Waste Activity	Mark 'X' in the appropriate bo	xes. Refer to i	nstructions.)
A. Hazardous	Waste Activity		B. Used Oil Fuel Activities
1. Generator (See instructions) a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (220 - 2,200 lbs.) c. Less than 100 kg/mo (220 lbs.) 2. Transporter (Indicate Mode in boxes 1-6 a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Rail 3. Highway 4. Water 5. Other - specify	4. Hazardous Waste Fue a. Generator Marketi	red for ctions. Ing to Burner device(s) - on Device r koller umace	1. Off-Specification Used Oil Fuel a. Generator Marketing to Burner b. Other Markerer c. Burner - indicate device(s) - Type of Combustion Device 1. Utility Boller 2. Industrial Boiler 3. Industrial Furnace 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification
IX. Description of Regulated Wastes (Jse additional sheets if neces:	ary)	
A. Characteristics of Nonlisted Hazardous wastes your installation handles. (See 40 1. Ignitable 2. Corrosive 3. Reactive (D001) (D002) (D003)	Wastes. Mark 'X' in the boxes con CFR Parts 261.20 - 261.24) 4. EP Toxic (D000) (List specific EPA I	responding to the	(ALSO SEE SECT. C, BELOW), number(s) for the EP Toxic contaminant(s)) A
1 2 F002 F003 7 8	3 F005 9	10	1 5 6 1 11 12
C. Other Wastes. (State or other wastes red	uiring an I.D. number. See instruct	ons.) 4 008	5 6
X. Certification		- L	
I certify under penalty of law that I ha and all attached documents, and obtaining the information, I believe that there are significant penaltie imprisonment.	that based on my inquiry o that the submitted informa	f those Indivi tion is true, at	duals immediately responsible for courate, and complete. I am aware
Signature Eluració M. lot	Name and Official Title (type		Date Signed 10/13/95
XI. Comments			
Note: Mall completed form to the appropr	iate EPA Regional or State Office.	(See Section III	of the booklel for addresses.)

Please print or type with ELITE type (*2 characters per inch) in the unshaded areas of		proved. OM8 No. 2050-0028. Expires 9-30-88. GSA No. 0246-EP4-0T							
United States Environmental Protection Agency Washington, DC 20460 Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).									
For Official Use Only									
	ments		·						
c			-						
Installation's EPA ID Number	Date Rec Approved (yr. mo.	eived day/							
C I L D 0 5 5 8 7 1 3 7 0 1/A C									
I. Name of Installation			_						
ETHYL PETROLEUM	ADDITI	VER ENRICH							
II. Installation Mailing Address									
	r P.O. Box								
3 P D N S A N O A V E .		State ZIP Code							
SAUGET		T162201							
III. Location of Installation			į						
Street or Ro	oute Number								
5 SAME			·						
City or Town		State ZIP Code							
IV. Installation Contact									
Name and Title (last, first, and job title)	Р	none Number (area code and number)]						
PARKS DONNA EN	V. ENGR. 6	185831323							
V. Qwnership			Į.						
A. Name of Installation's Legal Owner		B. Type of Ownership (enter code)							
RETHYL CORPORAT	ION	P							
VI. Type of Regulated Waste Activity (Mark 'X' in the app	T	nstructions.)							
1a. Generator 15. Less than 1,000 kg/mo.	6. Off-Specification Used	Oil Fuel							
2. Transporter 3. Treater/Storer/Disposer	a. Generator Mar	•							
☐ 4. Underground Injection ☐ 5. Market or Burn Hazardous Waste Fuel	☐ b. Other Marketer	-							
(enter 'X' and mark appropriate boxes below)	C. Burner	$q = \frac{1}{2}$							
S. Generator Marketing to Burner b. Other Marketer c. Burner	7. Specification Us (Or On-Site Burn	ed Oil Fuel Marketer er) Who First Claims e Specification.	-						
VII. Waste Fuel Burning: Type of Combustion Device (ent which hazardous waste fuel or off-specification used oil fuel is burned. S	ter 'X' in all appropriate boxes to	indicate type of combustion device(s) in							
☐ A. Unlity Boiler ☐ B. Industria	al Boiler 🔲	C. Industrial Furnace	RECEIVER						
VIII. Mode of Transportation (transporters only — enter	'X' in the appropriate box	esi energi en renergi en la	でした」Vだし						
A. Air B. Rail C. Highway D. Water E. D. IX. First or Subsequent Notification	ther (specify)		DCT 24 199						
Mark 'X' in the appropriate box to indicate whether this is your install notification. If this is not your first notification, enter your installation's E	lation's first notification of haze EPA ID Number in the space pro	ardous waste activity or a subsequent livided below.	EPA-DLPC						
☐ A. First Notification	em Cl	Installation's EPA ID Number							
	TLD	055871370							

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete.

Continue on reversa

- '					
			CIIII	ID — For Official Use On	ity IT/AIC
	5		w		1//
IX. Description of Haza	rdous Wastes (co)	ctinued from fro	nii Saaraa		
A. Hazardous Wastes from No from nonspecific sources yo	onspecific Sources, E	nter the four-digit nu	umber from 40 CFR Pa	an 261.31 for each listed h	azardous waste
		3	1 4	5	6
F002 F	003	F005			
7	8	9	. 10	11	12
B. Hazardous Wastes from Sp specific sources your instal	pecific Sources. Enter lation handles. Use ad	the four-digit numbe ditional sheets if nec	er from 40 <i>CFR</i> Part 2 cessary.	61.32 for each listed hazar	dous waste from
13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	23	29	30
C. Commercial Chemical Pro- your installation handles wi	duct Hazardous West	es. Enter the four-di us waste. Use addition	git number from 40 Co	FR Part 261.33 for each ch	emical substance
21	32	33	34	25	36
37	33	39	40	41	42
43	44	45	46	47	48
D. Listed Infectious Wastes. E pitals, or medical and resea					tals, veterinary hos-
49	50	51	52	53	54
E. Characteristics of Nonliste your installation handles. (S	d Hezerdous Wastes. See 40 CFR Perts 261,2	Mark 'X' in the boxe 21 — 261.24)	a corresponding to th		D005
1. Ignitable (D001)	⊠ 2	Corresive (D002)	□ 3. Re. (D0	active	4. Toxic Doog (D000) D018
X. Certification (468)		4.0			Series Police
l certify under penalt this and all attached obtaining the informa there are significant p	documents, and th tion, I believe that t	hat based on my the submitted in	inquiry of those if	individuals immediate accurate, and complet	ly responsible for te. I am aware that
Signeture		Name and Off	ficial Title (type or pri	nt) De	te Signed
Kand 7	Odum	David	FAdams	- Plant Har	20/4/91
EPA Form 8700-12 (Rev. 11	-85) Reverse				

BILLING CODE 6560-50-C

Appendix—Form—Notification of Hazardous Waste Activity

EPA Form 8700-12 (Revised 11/85)

Form Approved OMB No 2050 0028 Expires 9 30 88 GSA Vo 0246 EPA CI Please print or type with ELITE type (12 characters per motion the unshaded areas only Phase reter to the instructions for Filing Notification before completing this form. The information requested here is required by law isection 3010 of the Resource Conservation and Recovery Acts. United States Environmental Protection Agency Washington, DC 20460 **SEPA** Notification of Hazardous Waste Activity For Official Use Only Comments Date Received Installation's EPA ID Number mo. Approved ILD:055871 . Name of Installation I. Installation Mailing Address est or P.O. Box MONSA E City or Town State TSIAIUIGIET 220 III. Location of Installation Street or Route Number SAME City or Town State ZIP Code IV. Installation Contact Name and Title (last, first, and job title) ON V. Ownership 8 Type of Ownership (enter code) A. Name of Installation's Legal Owner P OR ON D P Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes, Refer to instructions.) A. Hazardous Weste Activity 8. Used Oil Fuel Activities 🔀 1a. Generator 15. Less than 1,000 kg/mo. 6. Off-Specification Used Oil Fuel (enrer 'X' and mark appropriate boxes below) 2. Transporter 3. Treater/Storer/Disposer a. Generator Marketing to Burner 4. Underground Injection b. Other Marketer 5. Market or Burn Hazardous Wasta Fuel (antar 'X' and mark appropriate boxes belaw) C. Burner 🔀 a. Generator Marketing te Burner 7. Specification Used Oil Fuel Marketer b. Other Markater ... (Or On-Site Burner) Who First Claims the Oil Meets the Specification. 🔲 c. Surner VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes te indicate type of combustion device(s) in which hazardous waste fual or off-specification used oil fual is burned. See instructions for definitions of combustion devicas.) A. Utility Boiler B. Industrial Boiler C. Industrial Furnace VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es) A Air 🔲 8. Rait C. Highway D. Water E. Other (specify) X. First or Subsequent Notification Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous weste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA'ID Number in the space provided below. C. Instaltation's EPA ID Number B. Subsequent Notification (complete item C) ☐ A First Notification 7131 JLD055 8

EPA Form 8700-12 (Rev. 11-85) Previous edition is absolete.

Continue on reverse

* * * * * * * * * * * * * * * * * * * *				D - For Official Use Only	
		<u>}-</u>	C ·		T/A-C
IX. Description of Haza	edous Wastes (co				
A. Hezardous Westes from No	onspecific Sources.	Enter the four-digit nur	nber from 40 CFR Par		
from nonspecific sources yo			ts if necessary	*•	
 	2	3	4	5	6
FOOZF	-003	F005			
7	8	9	to	11	12
B. Hezerdoue Westes from Sc	pecific Sources. Ente	r the four-digit number	from 40 CFR Part 26	1.32 for each listed hazard	lous waste from
specific sources your instal	lation handles. Use a	ditional sheets if nece	HESBIY.		
13	14	. 15	16	17	· ÷
19	20	21	22	23	24
25	26	27	28	29	30
C. Commercial Chemical Pro	duct Hazardous Was	tes. Foter the four-dio	it number from 40 CF	R Part 761 33 for each che	POLICE EUDSTRACE
your installation handles wi					-
31	32	33	34	35	36
10311 U	1151				
37	38	39	40	41	42
43	44	45	46	47	48
D. Listad Informacy Waster	East the favor district	10 CSE #10	751 75 500 000 000		
D. Listed Infectious Wastes. I pitals, or medical and resea					sia. Velerinary nos-
49	50	51	52	53	54
E. Characteristics of Nonlista			corresponding to the	cherecteristics of nonliste	d nazardous wastes
your installation handles. (S	See 40 CFR Perts 261 د۔۔۔	.21 — 261.24)	-		J Doo5
1. Ignitable (0001)	苬	2. Corrosive	☑ 3. Rea (DO	octive 03/	4 TORIC DOIS
X. Certification					
I certify under penalt	y of law that I had	ve personally exan	nined and am fam	niliar with the informa	tion submitted in
this and all attached obtaining the informa	documents, and stino logievetos	That based on my . It the submitted inf	inquiry of those is	ndividuals immediate	ly responsible for e. Lamaware that
there are significant p	penalties for subn	nitting false inform	ation, including t	he possibility of fine a	nd imprisonment.
Signature	21/11	l.	iciel Tide (type or pri	· ·	e Signed /
(1) aird	7 / Sil len	n Pla	ut Maa	nd r v	6/4/91
EPA Form \$700-12 (Rev. 11	LASI ROMONO	, , ,	· , , ~ .		

RECEIVED

JUN 1 3 7857

IEPA-DLFC

[Editor's note]

Form Approved. OMB No. 2050-0028, Expires 9:30-88, GSA No. 0246-EP4-07 Please prior for type with EUTE type #12 characters per inchi in the unshaded areas only Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation United States Environmental Protection Agence
Washington, DC 20460 SEPA Notification of Hazardous Waste Activity and Recovery Acti. For Official Use Only Economics Commenis VLD С 1989 Date Received mo. day) Installation's EPA ID Number (yr. Approved I. Name of Installation City of Town ZIP Code Location of Installation Street or Route Number State ZiP Code City or Town IV. Installation Contact Name and Title flast, first, and job title Ownership B. Type of Dwnership (enter code) Name of Installation's Legal Owne VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.) A. Hazardous Waste Activity B. Uped Oil Fuel Activities 12 1a. Generator ☐ 15. Less than 1,000 kg/mo. ☐ 6. Off-Specification Used Oil Fuel and mark apprepriate boxes below) 2. Transporter 3. Treater/Storer/Disposer Generator Marketing to Burner 4. Underground Injection 4 1989 NOV Other Marketer 5. Market or Burn Hazardous Waste Fuel 1 1989 (enter 'X' and mark appropriate boxes below) C. Rurner Specification Used Oil Puel Marketer 🖾 a. Generator Marketing to Burner RCRA-IMS b. Other Marketer (Or On-Site Burner) Who First Claims U.S. EPA, REGION V Whe Gil Heets the Specification. C Burner VII. Waste Fuel Burning: Type of Combustion Device tenter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices. J B Industrial Bniler C. Industrial Furnace VIII. Mode of Transportation (transporters only - enter 'X' in the appropriate boxles) B. Reil C. Highway D. Water L E. Other (specify) IX. First or Subsequent Notification Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below. C. Installation's EPA ID Number A. First Notification B. Subsequent Notification (complete item C)

Continue on reversa

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete.

•	ID — For Official Use Only
	C T/A C
IX. Description of Hazardous Wastes (continued from fro	
Nazardous Wastes from Nonapecific Sources. Enter the four-digit refrom nonspecific sources your installation handles. Use additional shape.	number from 40 CFR Part 261.31 for each listed hazardous waste
1 2 3	4 5 6
F002 F003	
7 8 9	10 11 12
B. Hazardous Wastes from Specific Sources. Enter the four-digit num specific sources your installation handles. Use additional sheets if no	
13 14 15	16 17 18
19 20 21	22 23 24
25 26 27	23 29 30
C. Commercial Chemical Product Hazardous Wastes. Enter the four- your installation handles which may be a hazardous waste. Use addr	
31 32 33	34 25 36
<u> </u>	P120 U189 U151
37 33 39	40 41 42
43 44 45	46 47 48
D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR pitals, or medical and research laboratories your installation handles	Part 251 34 for each hazardous waste from hospitals, veterinary hos- . Use additional sheets if necessary.
49 50 51	52 53 54
E. Characteristics of Nonlisted Hazardous Wastes, Mark 'X' in the box your installation handles. (See 40 CFR Peris 261.21 — 261.24)	•
1. Ignitable 2. Corrosive (D001)	3. Reactive (D000)
X. Certification	
I certify under penalty of law that I have personally ex- this and all attached documents, and that based on m potaining the information, I believe that the submitted in	amined and am familiar with the information submitted in y inquiry of those individuals immediately responsible for information is true, accurate, and complete. I am aware that mation, including the possibility of fine and imprisonment.
	thicial Title (type or print) Date Signod LL 10 89
584 Form 9700 12 /Bay 11 95) 7-	1 T. Maams
EPA Form 8700-12 (Rev. 11-35) Reverse P La	I F. Adams u/10/87

Please print or type with	ELITE type / 1	2 char.	متنبح سسم برجيد	والمستحدث والمستحد			بسحيت	عالم المساحة ا	ومستخريسة				For	m Ap	рғачес	. OMB	No. 20	50 00. GS	28 Ex A No	0246 0246	9.30- 6.EP4	88. -()F	****	
			United	States	Envi Vashi	ronn	ienta n, DC	Prot. 2046	ectio 60	n Ag	ency		1					la the <i>tian</i> be					AUG	77
SEPA	A1 - 4:4		47		1 F					Ş٨	* (5.			# } 1⊁	is for a	n. The	inform	natio	n reg	uesia	co i		(
	Notif	ıca	TIOF	OT	ma	ıza	rae	ous	: VI	/as	ste	AC	UVI	ty	3		the R	lesour					$\boldsymbol{\Box}$. !
For Official Use	Only 🔯		a de	1275	9.5	4	ŧ.	14 H. C. X	1	riya T			on sy	Q.C		得尼					- Sec.	3	00	
								Com	nent	s												\mathcal{F}	1988	
	1.		ļ		'		ļi			ļ		ļ		ĺ		1	[]		. [1	(1)	0	
c						<u> </u>																_		
	Installation	'è EPA	4 1D No.	mbar				- (pprov	und	/yr		Rec mo.	eived	davi	16	313	216	00	13	-		
С	The state of the s	1	1.010	T. T. T.	1		T/A	_c	-1	ррго	Veu	1		Ţ	·	1	1					I		-
FILDO	5 5	8	711	3	7	0		1							-									
I. Name of Instal	lation 🕏		4.80									2			3									
		1-1	_ _		1.	Ì	ĺ.												_ [اَہ			
FITIHIY !	<u> </u>	! <i>‡</i>	TIR] <u>/</u>	E		IV I	3 5-5	A		DI			V []) E	5			N				
II. Installation M	aning Ad	ares	S 1.3%						**************************************								100							
		T		T	T	Γ-	T 3"	eet or	0	. DUA	 		T	\top		T	Τ-					\dashv		
3 MION S	AN	T	ol	_la	_Y_	E] 1	1		}	1					}) '))))	1		
				Ci	ty or	Town											tare		ZI	P Co	de	_1		
		1 1	!		1) }					ì			1 -	-{ ,				1	_		
415 1A 1U IC	IEII		Sec. 3	1	-		A 20		3. A.	***	VS 77			49 S.W.	F-7-8-2	- J	3.7	6	2	2	0	-		
III. Location of I	nstailatio	n is													1.0		- 2			u iš				
C T T T	T	T			T	┰-³	reet	or Ro	oute	Nam	Der	Т				_T	Τ-	Г Т						
5 5 A M E	:			-			}	1			}	}	- {	- }		-	1	}	}	ļ		1	•	
				C	ty or	Towr	1									1	State		Z	IP Co	ode	7	ı	
C	_				1	1		}					T	$\neg \vdash$	\neg	_								
65 A M P		 	32.43				i Prode	l Andrew	- T				 				1		4	1		-		
IV. Installation C		4.6					77.5		e ije	î-a	-			N.C.					7-14	V 2		2		
	iva	me zn	d Title	7ast, 1	rsi, 3	<u>na 10</u>	D UIK	"	1	1	1 - '	Τ Τ	-+	!	Phone	Num	e <i>r (ar</i>	ea coo	te an	d nu	mber.		ļ	
2 D F. A	ADA	M	5	P	1/	A	N	17		M	G	R	- [6	1 3	3 2	기기	4	4	0	0	0		
V. Ownership	12.2			a jarê ji	2.0	9			15 3.24		C_{ij}							3	10	64 # 20 K	3.2			
		A. I	Vame o	insta	lation	's Le	gal ()wne	r							8. Ty	pe of	Owne	rship	(ent	er co	de)		
	, ,	100				1		1	,		1		- {	- {	· ·	Ð						ı		
W. Type of Beer	Jato d Mr.	<u>ال</u>	ON	119	10	<u> </u>	1/	<u> </u>		10			O- (-		بلب			12.00		S = . 15	-62-0	\$.738X		
VI. Type of Regu	A. Hazard					<u> </u>	n tre	e anj	orop V	oriat	e oo	xes.				Fuel /							·	
1a. Generator	A. FIBZUIG		15. Le			00.1			╁┮	10							4011011	162		A 2-1-1	~	s paris sizes	الإنت سنت تبدأ	ė.
2. Transporter		L	, ID, Le	55 1112	11 1,0	OU K	17 mo	•	-			pecific X ar					xes b	ełow)			ا کنار را	144		our carried
3. Treater/Store	er/Disposer											a. Gen	orato	r tha	ek ari n	a to R	urn ar			الاستال		- 1		N. Carlot
4 Underground					•						_					8 20 0	4.1.61		٥.					
5. Market or Bu	n Hazardo	ıs Wa	ste Fue	d 6 -4							L.,j	b. Othe	er Ma	rkete	∋r					ÂL		al d	1988	9
lenter 'X' a/id ☐ 3. Gene	-				′				_	-		c. Burn						-			,			
	Marketer	•	~ P-34/110	•					[二] 7	.Sp ≀∩	ecifi r Op-	catio Site	on U Born	sed (ner)	ul Fi Who	æl M First	arket Clai	er msil	S	FPA)	EGION	
🔲 c. Burne	r											e Cil									10774		PMS	@ 46
VII. Waste Fuel	Burning:	Туре	of Co	mbu	stio	n D	evic	e (ent	'er 'X	in a	Happ	ropria	e box	esto	indic	ate typ	e of co	วงาวบร	tion	devid	ce(s)	'n	Ì	
which hazardous wa	ste fuel or d –	tt-spe	edicati	on use	á oil i	luel i	s bur	ned. S	See i.	nstru	uction	s for c	elinit	ions	of co:	nbust.	on de	vices.	,				1	
	A, Utility		_					iustri				·				iustria 1964	l Furn	ace	200		E CO	ere ere	ļ	
VIII. Mode of Tr	ansporta	tion	<u>[trans</u>	porte	rs o	n/y -	<u>– er</u>	iter	X' i.	n th	e ap	propi	rate	box	(esi	ite (C		**************************************		10	17.4			
☐ A. Air ☐ B.	Rail 🔲	C. Hig	hway		D. Wa	ler		E. O	iher/	spec	rfy)												Ì	
IX. First or Subs	equent l	lotif	icatin	n 😅	1	* 2			2	27		*	*	m. c	A.1					200		1	İ	
Mark 'X' in the appr	corrate box	מי 10	dicate v	whethe	er thi	\$ is 1	YOUF	nstal	látioi	n's fi	rstn	outica	ion o	ha:	ardo	s was	le ac	tivity c	ora:	subs	equer	7 6476 7 (]	
nonfication. If this is	not your fir	st not	rfication	ı, ente	r you	Finsi	allati	on's f	EPA I	M G	unibe	r yr the	spac	e pr	ovided	belo:	N,							
	~											/ }			Inst	altatio	n's EF	A ID A	tenst	per				
A. First Notifica	tion 🔀	G, Sul	hseque:	it Nob	heam	on <i>[c.</i>	omple	ile ne	m C	,	1/		, }	7		ر ـــ	- 0	1-	1	12		1/	ļ	
********************************				*****	and the same					- 1	#		-	42!	بليا	2	שוי	1/	11	1 🕽	21_/	<u> </u>	1	

		1	D — For Official Use Onl	v I
				T/A C
IX. Description of Hezardous Waste	t (continued from too	W		
A. Hazardous Wastes from Nonspecific Sour				vardous waste
from nonspecific sources your installation t	randles. Use additional she	eets if necessary.		
1 2	3	4	5	6
F003				
7 8	9	10	11	12
8. Hazardous Wastes from Specific Sources	Enter the four-digit numb	er from 40 <i>CFR</i> Part 26	1.32 for each listed hazar	dous waste from
specific sources your installation handles.	Use additional sheets if ne	cessary.		
13 14	15	16	17	18
19 20	21	22	23	24
25 26	27	23	79	30
C. Commercial Chemical Product Hazardous your installation handles which may be a h	Westes, Enter the four-d	igit number from 40 CF	P Part 261.33 for each ch	emical substance
21 32 V	T-T	1 (/ 1	·	
	33	34	25	36
00119 0031	<u>U1154</u>	P1120		
37 33	29	40	41	42
43 44	45	46	47	48
D. Listed Infectious Wastes. Enter the four-dipitals, or medical and research laboratories	igit number from 40 CFR F	an 261.34 for each haz	ardous waste from hospi	tals, veterinary hos-
49 50	1 1 - 			1 .
	1 - 51	52	53	54
E. Charecteristics of Nonlisted Hezardous W your installation hendles. (See 40 CFR Part	rastes, Mark 'X' in the box s 261,21 — 261,24)	es corresponding to the	characteristics of nonlist	ed hazardous wastes
1. Ignitable (D001)	2. Corresive	→ 🔲 3. Read	ctive	4. Toxic
X. Certification	(1.70.2)	(DO)		(D000)
I certify under penalty of law that this and all attached documents, obtaining the information, I believe there are significant penalties for	and that based on my ethacthe submitted in	y inquiry of those in nformation is true, a	ndividuals immediate ccurate, and comple	ely responsible for te. I am aware that
Signatura	Name and O	fficiel Title (type or prin	r) De	te Signed
Chang / Mount	Plan	+ Manage		7/22/88
EPA Form 8700-12 /Roy 11-25) Revose		1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1		

BILLING CODE 6560-50-C

RETHYLE PLANTON SPALD, NUMBER APPROVED ON TRACEDURE FILEDOS 8 7 1 3 7 0 1 1 I. NAME OF INSTALLATION III. INSTALLATION MAILING ADDRESS STREET OR TOWN ST. ZIP CODE STREET OR TOWN ST. ZIP COD		SEPA	v.s. er NOTIFICATION	NVIRONMENT ON OF HAZ			TE A	37.93	563 _{IN}	ISTRU	CTION	IS: If	you re	eceived	a preprint	ed bc
L MARS OF INSTALLATION MISTALLATION MALLING ADDRESS: IN PARLY MARKED THAN PETROL ELIM ADDITIONS TREET ADDRESS: MARKED THAN PETROL ELIM ADDITIONS STREET ADDRESS: MARKED THAN STALLATION MISTALLATION SEPA I.S. HUMBER APPROVED TO SET THE SERVICE OF THE SER		TIDN'S EPA	NAME: PRES	S HARD WHEN FIL	LING IN NAMI	E & ADDRES	S.	*Es	inf thi in	formati rough the ap	ion on it and ppropri	the lat I supplicate sec	bel is in ly the ection b	incorrect correct below. I	t, draw a li information If the label	ine on Lis
THAT TETROLEM ADDRESS STREET ADDRESS STREET ADDRESS STREET ADDRESS MARKATO AVE ENTY, STATE, & ZIP CODE: SAUGET TL 62201 TOR OFFICIAL USE ONLY COMMENTS TORN OFFICIAL USE ONLY COMMENTS THAT ADDRESS STREET OF ROLE WAS	Total College	I. STALLATION			SASSE SESSE A			&	co	omplete	and o	correct	t, leave	ltems i	I, II, and	111
MOSANTO AVE ETY, STATE, 8 ZIP CODE: SAUGET IL 6220: SAUGET IL 6220: FOR OFFICIAL USE ONLY COMMENTS COM	The state of the s	INSTALLA- TION II. MAILING	STREET ADDR	ESS:		<u> </u>	ı	N.	lat sin tre	bel, co ngle sit eated,	mplete te whe stored	e all ite ere haz I and/o	ems, "I zardous or dispe	installati s waste losed of,	ion" mean: is generate , or a tra	s a ed, ins-
INSTALLATION MALLATION STALLATION	- Action of the last				·		MORPH MADERNA STREET	Constitution	to	the II	NSTRU	UCTIO	NS FO	R FILI	ING NOTI	FI-
TOR OFFICIAL USE ONLY COMMANTS COM	-	III DF INSTAL-			y	<i>~1</i>			in	nformat	tion red	questec	d herei	in is req	quired by l	law
COMMENTS COMMEN	The second secon	LATION	JAUGET	· ·	c22	U				recovery	y Act).		nesou	лсе Соп	servation (ar)d
RETHYLE PALATION SPALLATION INSTALLATION OF INSTALLATION INSTALLATION ON OF INSTALLATION SEGAL OWNER INSTALLATION ON OF INSTALLATION OF INSTALLATION SEGAL OWNER INSTALLATION OF INSTALLATION	W I U	FOR OFFICIAL I	USE ONLY	1						e le julije e					100	1
RETHYL PETROLENGE OF TOWN INSTALLATION SEPALD, NUMBER APPROVED ONTERICITIES INSTALLATION SEPALD, NUMBER APPROVED ONTERICITIES INSTALLATION SEPALD, NUMBER APPROVED ONTERICITIES INSTALLATION MAILING ADDRESS STREET DRIVE, OB DAY AND	DETA				СБМ	MENTS			-	-		7		-	-	
NSTALLATION SEPAILO NUMBER FILLOGIS 87/1370 11 I. NAME OF INSTALLATION BTHYL PLET ROLE UM ADDOTY VES TWC STREET OR ROUSE										<u> </u>			<u></u>	5\$	-	
II. NAME OF INSTALLATION THEY L PETROLEUM L PORTON L PROPERTO		INSTALLATI	DN'S EPA I.D. NUMI		Dayda			-					= 			
II. INSTALLATION MAILING ADDRESS STREET OF FO. DOX STREET OF FO. DOX CITY OR TOWN STREET OF ROUTE NUMBER IV. INSTALLATION CONTACT NAME AND TITLE (flast, first, 8, job fille) PRONE NO. (gras code & no.) TO BE A TOWN SET OF THE PROPER OF THE PROPERTIES OF TH		FIL DOS		0 1				1	-	_		_	·			
III. LOCATION OF INSTALLATION STREET OR P.O. BOX CITY OR TOWN ST. ZIP CODE AND SAME CITY OR TOWN STREET OR ROUTE NUMBER CITY OR TOWN STREET OR TOWN STREE	- Contraction	<u> </u>	100.00 (00.000)				72			20 K L					Σ.Δ	
III. LOCATION OF INSTALLATION STREET OR P.O. BOX CITY OR TOWN ST. ZIP CODE STREET OR ROUTE NUMBER STREET NOT ROUTE NU		ETHYL	PETROL	EUMA	أنواط	7 UV	ES	INC					\prod			
STREET OR P.O. BOX CITY ON TOWN STREET OR ROUTE NUMBER STRET OR ROUTE NUMBER STREET OR ROUTE NUMBER STRET OR ROUTE NUMBER STREET OR ROUTE NUMBER STRET OR ROUTE NUMBER STREET OR ROUTE NUMBER STRET NUMBER		30			100 78/12				1 1	20			67			
CITY OR TOWN ST. ZIP CODE A JUGET III. LOCATION OF INSTALLATION STREET OR ROUTE NUMBER STREET OR ROUTE NUMBER CITY OR TOWN ST. ZIP CODE STREET OR ROUTE NUMBER S SAME CITY OR TOWN ST. ZIP CODE STREET OR ROUTE NUMBER S SAME CITY OR TOWN ST. ZIP CODE ST. ZIP CODE OTD AG S SAME CITY OR TOWN NAME AND TITLE (last, first, & job title) PHONE RD. (area code & no.) S SAME CITY OR TOWN NAME AND TITLE (last, first, & job title) PHONE RD. (area code & no.) S SAME CITY OR TOWN NAME AND TITLE (last, first, & job title) PHONE RD. (area code & no.) S SAME S SAME CITY OR TOWN NAME AND TITLE (last, first, & job title) PHONE RD. (area code & no.) S SAME A NAME OF INSTALLATION'S LEGAL OWNER A NAME OF INSTALLATION'S LEGAL OWNER S ST. ZIP CODE OTD AG S SAME SAME S SAME S SAME S SAME S SAME S SAME S SAME S SAME S SAME S SAME S SAME S SAME S SAME S SAME S S		c			O. BOX											
CITY OR TOWN STREET OR ROUTE RUMBER STAND STAN			INTO AV	E						5	_	:		٠		
III. LOCATION OF INSTALLATION STREET OR ROUTE NUMBER STREET OR ROUTE NUMBER CITY OR TOWN ST. ZIP CODE OND AS CITY OR TOWN ST. ZIP CODE OND AS CITY OR TOWN ST. ZIP CODE OND AS CITY OR TOWN IV. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE ND. (area code & no.) T. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE ND. (area code & no.) T. INSTALLATION CONTACT NAME OF INSTALLATION'S LEGAL OWNER ON OWNERSHIP A. NAME OF INSTALLATION'S LEGAL OWNER ST. ZIP CODE OND AS PHONE ND. (area code & no.) T. INSTALLATION CONTACT NAME OF INSTALLATION'S LEGAL OWNER ST. TREATSPORTATION (complete item VII) ST. TREATSPORTATION (complete item VII) T. A. AIR ST. CITY OR TOWN LEGSTIP A. AIR ST. TREATSPORTATION (transporters only - enter "X" in the appropriate box(es)) T. A. AIR ST. CITY OR TOWN ST. ZIP CODE OND AS PHONE ND. (area code & no.) T. T			CITY	OR TOWN			· · · · · · · · · · · · · · · · · · ·	5T.]					
III. LOCATION OF INSTALLATION STREET OR ROUTE NUMBER S SAME CITY OR TOWN ST. ZIP CODE OVER AD IV. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE NO. (area code & no.) T. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE NO. (area code & no.) T. INSTALLATION CONTACT NAME OF INSTALLATION'S LEGAL OWNER A. NAME OF INSTALLATION'S LEGAL OWNER T. INSTALLATION (complete item VII) F = FEDERAL M = NON-FEDERAL M = NON-FEDERAL M = NON-FEDERAL M = NON-FEDERAL S C. TREAT/STORE/DISPOSE D. UNDERGROUND INJECTION VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box (es)) VIII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box (es)) WILL THE TRANSPORTATION (transporters only - enter "X" in the appropriate box (es)) WIII. THE TO RESUSE QUENT NOTIFICATION Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. A. FIRST NOTIFICATION A. FIRST NOTIFICATION A. FIRST NOTIFICATION J. B. SUBSEQUENT NOTIFICATION (complete item C) IX. DESCRIPTION OF HAZARDOUS WASTES			7					上上	<u> </u>	30		yat.		1 1 1 1	C #5-	
CITY OR TOWN ST. ZIP CODE OND AND IV. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE ND. (area code & no.) PHONE ND. (area code area code area code area code area code area code area code are	1	3	OF INSTALLATIO	בן באגעונ			40	42	-	13						
CITY OR TOWN ST. ZIP CODE OWD AND IV. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE ND. (area code & nc.) PHONE ND. (area code & nc.) The property of the state of the sta		5 SAME		A STATE OF THE PARTY OF THE PAR	NUMBER					Water Park		este de	See 1	7.400	7	
IV. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE ND. (area code & no.) PHONE			CITY	OR TOWN				ST.			7	200	*	J NO F	ř	
IV. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE ND. (area code & no.) PHONE ND. (area code & no.) NAME AND TITLE (last, first, & job title) PHONE ND. (area code & no.) NAME AND TITLE (last, first, & job title) PHONE ND. (area code & no.) NAME AND TITLE (last, first, & job title) PHONE ND. (area code & no.) NAME OF INSTALLATION'S LEGAL OWNER SOLUTION A. A. NAME OF	Ì	651115							$\top \top$	ΤŤ	7	-		4.5	g & F	
NAME AND TITLE (last, first, & job title) PHONE ND. (great code & no.) The state of the properties of the properties better into box) PHONE ND. (great code & no.) PHONE ND. (great co	j	15 16	HON CONTACT				A A	0 41 42	A7				yn R	(1461)) 		
A. NAME OF INSTALLATION'S LEGAL OWNER A. NAME OF INSTALLATION (complete item 'X' in the appropriate box(es)) A. GENERATION B. TRANSPORTATION (complete item VII) A. AIR A. AIR B. B. RAIL B. C. HIGHWAY B. D. WATER B. D. WATER B. D. WATER C. INSTALLATION'S EPA I.D. NO. C. INSTALLATION'S EPA I.D. NO. A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C)	ì	HOIALLA.		ND TITLE (last,	first, & job	b title)				Pi	HONE	ND. (a	rea coo	ie & no.	<u> </u>	
A. NAME OF INSTALLATION'S LEGAL OWNER A. NAME OF INSTALLATION (complete item 'X' in the appropriate box(es)) A. GENERATION A. GENERATION A. AIR A. AIR B. TRANSPORTATION (complete item VII) A. AIR B. D. WATER B. D. WATER B. D. WATER B. D. WATER C. INSTALLATION'S EPA I.D. NO. C. INSTALLATION'S EPA I.D. NO. A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) A. FIRST NOTIFICATION (Complete item C) A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C)	į		RWD	DIREC	TOR	OF	OP	FA	7100	561	18-	27	4.	4 dc	20	
A. NAME OF INSTALLATION'S LEGAL OWNER C	į	15 16	7181 18181 1 1		<u></u>					63 AS	_ A8	149 -	51	52 -	55]	
Solution	~≪((A. NAME OI	FINSTALL	LATION'S	LEGAL	OWNER			-				1	
(enter the appropriate letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es)) A. GENERATION F = FEDERAL M = NON—FEDERAL J = C. TREAT/STORE/DISPOSE G D. UNDERGROUND INJECTION VII. MODE OF TRANSPORTATION (transporters only — enter "X" in the appropriate box(es)) A. AIR G B. RAIL G C. HIGHWAY G D. WATER G E. DTHER (specify): VIII. FIRST OR SUBSEQUENT NOTIFICATION Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below. C. INSTALLATION'S EPA I.D. NO. A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) IX. DESCRIPTION OF HAZARDOUS WASTES	ν.	15 16		RATIC	2									5	5	Wasan .
F = FEDERAL M = NON-FEDERAL VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es)) VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es)) Lateral Control	D E	(enter the appropr	riate letter into box)				ASTE A	CTIVI		***					4982962	
VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es)) A. AIR B. RAIL C. HIGHWAY C. WATER C. DTHER (specify):	•			57	•			- 	56		•				· v11)	
VIII. FIRST OR SUBSEQUENT NOTIFICATION Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below. C. INSTALLATION'S EPA I.D. No. A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) IX. DESCRIPTION OF HAZARDOUS WASTES			56	59				appron	60			ND IN	JECTI	ON		76 TH
VIII. FIRST OR SUBSEQUENT NOTIFICATION Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below. C. INSTALLATION'S EPA I.D. NO. A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) IX. DESCRIPTION OF HAZARDOUS WASTES				·						.,						
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below. C. INSTALLATION'S EPA I.D. NO. A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) IX. DESCRIPTION OF HAZARDOUS WASTES		61		6.5	**************************************	64		ਜ਼ ਂ							(g)	
A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) TLD 05587137C		Mark "X" in the an	ppropriate box to indi	cate whether th	is is your in	nstallation' .D. Numbe	's first not r in the sp	tification pace prov	of haza vided be	irdous v low.	vaste a	ictivity	Or a su	ıbsequei	nt notificat	tion.
IX. DESCRIPTION OF HAZARDOUS WASTES		A. FIRS	T NOTIFICATION	B. St	UBSEQUE!	NT NOTIF	'ICATION	(compl	ete item	C) \	C				EPA 1.D. 1	7.C
Please go to the reverse of this form and provide the requested information.		1			- CHOCK THE CONTRACT OF THE CO	rmo*:										

		5 W	T/A C
IX. DESCRIPTION OF HAZARDOUS WASTES (con	ntinued from front)	1 2	13
A. HAZARDOUS WASTES FROM NON—SPECIFIC SOURC waste from non—specific sources your installation handles	CES. Enter the four—digit number from Use additional sheets if necessary.	n 40 CFR Part 261.31 for ea	uch listed hazardous
B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. En specific industrial sources your installation handles. Use a	3 4 23 24 10 10 10 10 10 10 10 10 10 1	23 25 11 23 26 R Part 261.32 for each liste	12 m H
13 14 26 23 26 23 23 26 23 23 26 25 26 25 26 23 23 26 25 26 26 23 23 26 25 25 26 25 26 25 25 26 25 25 26 25 25 26 25 25 26 25 26 25 25 25 26 25 25 25 25 26 25 25 25 25 25 25 25 25 25 25 25 26 25 25 25 25 25 25 25 25 25 25 25 25 25	21 22 23 26 27 28 23 26 27 26 28 23 26 25 28 25 26 27	17 23 26 23 23 26 29 29 20 26 10 27 20 26 10 27 20 26 20 27 20 26 20 27 20 26 20 27 20 27	18 23 26 24 23 26 30 23 26 30 23 26 30 25 26 30 25 26 30 25 26 25 26 25 26 25 26 26 26 26 26 26 26 26 26 26 26 26 26
stance your installation handles which may be a hazardous 31 32 23 25 37 38 23 24 43 44 23 24 25 22 23 23 24 23 24 25 26 27 28 29 20 20 21 22 23 23 24 25 25 26 27 28 29 20 20 20 20 20 20 20 20 20	33 34 34 34 39 39 39 40 40 39 40	35 23 - 26 41 23 - 26 47	36
D. LISTED INFECTIOUS WASTES. Enter the four—digit no hospitals, medical and research laboratories your installation. 49 50 E. CHARACTERISTICS OF NON—LISTED HAZARDOUS hazardous wastes your installation handles. (See 40 CFR)	on handles. Use additional sheets if ne	53 53 23 25	54
X1. IGNITABLE (D001) X. CERTIFICATION I certify under penalty of law that I have persona attached documents, and that based on my inquiry I believe that the submitted information is true, ac mitting false information, including the possibility of	RROSIVE []3. REA (D003) The second constant of the second constant	th the information subm	ng the information
W. D. Taylor	NAME & OFFICIAL TITLE (type or	print)	6/9/87

W. D. Maylon EPA Form 8700-12 (6-80) REVERSE



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

under subtruct of Reign				
EPA I.D. NUMBER	> .	ILD055871370	REACK	NOWLEDGEMENT
		ETHYL PETROLEUI	M ADDITIVES	INC
	- C*	MONSANTO AVE SAUGET	ĮL.	62201
INSTALLATION ADDRESS		MONSANTO AVE SAUGET	IL	62201
8700-12B (4-80)		11/19/84		

m n/19/84

INSTRUCTIONS: If you received a preprinted

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

	INSTALLA- TION'S EPA I.D. NO. NAME OF IN- 1. STALLATION						inform throug in the compl	nation on the it and appropri ete and c	the label is supply the ate section correct, leave	incorrect, dra correct info below. If the ltems I, II, t receive a pr	ormation le label is and III
	INSTALLA- TION II. MAILING ADDRESS	PLEAS	SE PLACE LA	BEL IN T	HIS SPA	CE	label, single treated porter	complete site whe d, stored 's princip	all items. " re hazardou and/or disp al place of	'Installation" is waste is ge posed of, or business, Ple	means a enerated, a trans-
¥	LOCATION IIL OF INSTAL- LATION		NOV 1319 WMB - RA	84 717 012 V			CATIO inform (Section	ON befonation rec	re complet quested here	OR FILING ting this for sin is required urce Conserva	rm. The d by law
ACH!	FOR OFFICIAL	USE ONLY	机等和 多加岭			的情報的		Par Eyr	die legis		种种
DET	<u> </u>			COMMEN	rs						
4	C 15 16				ERECEIVE					55	
	5	ON'S EPA I.D. NUM	BER APPRO		mo., & day						
	FILDO5	5 8 / 1 3 7	0 1	6 17		22	1 .: I T - a . a . 6 . 6 . 6	Accessor to the sections	de la factura estada	and the second second second	
	I. NAME OF INS	TALLATION		41							
1000	ETHYL	PETROL	EUM AD	DITIO	VES	IMC			67		
	II. INSTALLATI	ON MAILING AD	DRESS STREET OR P.O.			dia di sales	itisk like		u -5:3:4/ =1		14
	3 MONS A	NTO AV	E E				45	L.K.			
	c	CITY	OR TOWN		1 1-1-	ST.	ZIP CODE				
	4 S A UG E	1				10 41 42 4	220	51			
	III. LOCATION	OF INSTALLATIO				132.17			植物物类	atemeter	1 4 11
	5 5 A M 6	STRE	ET OR ROUTE N	JMBER .			45				
	С	CITY	OR TOWN		-	sr.	ZIP CODE				
	6 SAME					40 41 42 4	7 -	5.1			
	IV. INSTALLAT	A		ASP Fib	1.05.1		PISTERN CO		rise in		guer in
	c c		ND TITLE (last, fir	st, & joo title,	4316	Ai /4 /2 /	10 /	PHONE	NO. (area co	de a no.)	
	2 11 5 10 1 1		S A M		WI M	MAG	A3 A6	- 48	49 - 31	52 - 55	
-	V. OWNERSHIP		A. NAME OF I	NSTALLATIO	N'S LEGA	LOWNER		W. T. T.		STICKS IN	
ETACH	15 16	CORPO	RATION							35	
0	(enter the appropr	OWNERSHIP riate letter into box)	VI. TYPE OF I			ACTIVIT				ate box(es), plete item VII	A CONTRACTOR OF THE PARTY OF TH
	F = FEDERA M = NON-FE		57	ENERATION	12. 14		-		ITOS (comp		,
	VII. MODE OF	TRANSPORTATIO)N (transporters	only - ente	r "X" in t	he appropr	iate box(e	s//	er" le reis	er in the	ing six a ci
	A. AIR	B. RAIL	C. HIGHWA	AY 54	. WATER	E. O	THER (spec	cify):			
		SUBSEQUENT NO			A find of the second	Same and the same	ident ka kultu	经加州	h hit	HUZZI MAR	"相"。
		ppropriate box to indi first notification, ente									
	A. FIRS	T NOTIFICATION	. 8. SUB	SEQUENT NO	OTIFICATION	ON (complet	te item C)	C.	LD05	TION'S EPA	3 7 A
	IX. DESCRIPTION	ON OF HAZARDO	US WASTES			Aria Iras	有用 4 二				
		verse of this form and		sted informati	on.		THE PARTY OF				

ary	
135	D
all	DETACH
n, ıb-	CH

				I.D FOR OF	FICIAL USE ONLY
				w	1/2
DECCRIPTION OF	TATE DE CHE WAST	EG /		1 2	To the to the present appeal of the
DESCRIPTION OF I			- FRANKS	- 40 CER Post 201 21 40	de la lactura de la constante
HAZARDOUS WASTES waste from non-specific				n 40 CFH Part 261.31 10	ir each fisted hazardou.
1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
			MITTER TOTAL		
23 . 25	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
HAZARDOUS WASTES pecific industrial sources				R Part 261.32 for each	listed hazardous waste fro
				1	
13	14	15	16	17	18
19	20 20	23 - 26	23 - 26	23 - 26	23 - 35
1,3	20		1		
23 - 26	23 - 26	23 - 26	23 2 26	23 - 26	23 - 26
25 25	26	27	28	29	30
23 2 26	23 - 26	23 - 26	23 2 26	23 - 26	23 26
					33 for each chemical sub-
stance your installation h	andles which may be a t	nazardous waste. Use ad	ditional sheets if necess	sary.	
31	32	33	34	35	36
23 - 28	23 - 26	23 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
43	23 - 26	45	46	47	48
23 . 26	23 25 26	23 26	23 - 26	22	
				ach listed hazardous was	te from hospitals, veterina
	search laboratories your				, ,
49	50	5 1	52	53	54
23 - 26	23 - 26	23 - 26	23 26	23 - 26	23 - 26
	F NON-LISTED HAZA stallation handles. (See			responding to the charac	teristics of non-listed
		_			2.79
(D001)		2. CORROSIVE	3. REA (D003)	CTIVE	(D000)
CERTIFICATION	Market State of the state				所有。 1016年1月1日 - 1016年1月1日 - 1016日 -
	The street of the Carrier (gath)	- Office and the state of the state of the			A STATE OF THE STA
					ubmitted in this and a caining the information
believe that the subn	nitted information is	true, accurate, and a	complete. I am awar		ficant penalties for sui
itting false informati	on, including the poss	sibility of fine and im	prisonment.		
NATURE		NAME & OF	FICIAL TITLE (type of	r print)	DATE SIGNED
1 // 1/	m4.///.	6	E MANAGE	- 0	10/15/84
. / 1 / 19					



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER	° ILD055871370	REACKNOWLEDGEMENT
	COOPER EDWIN INC MONSANTO AVE EAST ST LOUIS	IF esso:
INSTALLATION ADDRESS	MONSANTO AVE EAST ST LOUIS	IL 65501

EPA Form 8700-12B (4-80)

09/28/81

U.S. ENVI. IMENTAL PROTECTION AGENCY

SEPA	NOTIFICAT	ION OF HAZA	ARDOUS V	NASTE A	ACTIVITY			iver a preprinted eft. If any of the
INSTALLA- TION'S EPA						information o	n the label is inco	prrect, draw a line rrect information
`. NO.	1LD05587	1370				in the approp	riate section belo	w. If the label is
ME OF IN-		MITEL TEAT				below blank.	If you did not rea	ems I, II, and III ceive a preprinted
INSTALLA- TION II. MAILING	COOPER EI MONSANTO					single site wh	ere hazardous w	allation" means a aste is generated,
ADDRESS	EAST ST L	AVE OUIS, IL	622010	187	AUG 10 00	porter's princ	ipal place of busi	d of, or a trans- ness. Please refer
				101	400 18 00	CATION bet	ore completing	FILING NOTIFI- this form. The
IIL OF INSTAL-	MONSANTO EAST ST L	AVE LOUIS: IL-	ESSO I					s required by law Conservation and
med have see to be						Recovery Act,	NOTE TO SAME	
FOR OFFICIAL	USE ONLY							
c			COMMEN'	TS		11111		
C 15 16								55
INSTALLATI	ON'S EPA I.D. NUN	BER APPR	OVED (yr.,	mo., & day				
FULUPS	5 8 7 3 7	13 14 15 1	BIL	1 ISION	5	1		
I. NAME OF INS	TALLATION	ALCO Y		CAL HAVE		-		THE WALL
30							67	Constant of
II. INSTALLATI	ON MAILING AD		(PERSONAL PROPERTY OF A PERSONAL PROPERTY OF					
c		STREET OR P.O.	BOX	TIT				
15 16		<u> </u>				45		
STITE OF THE STATE	CITY	Y OR TOWN	TITI	TIT	ST. ZI	PCODE	+ 1	
'					40 41 42 47	~ 51		Mark Street, street,
. JCATION	OF INSTALLATION	ON SET OR ROUTE NO	IMBER				Carolin V	
5			THE	III				
15 16	CITY	OR TOWN			ST. ZII	45 P CODE		
6			TITT	TIT				
IV. INSTALLAT	TON CONTACT			And the same	40 41 42 47	- S1	and the same of	
IV. INSTALLAT		MD TITLE (last, fir	rst, & job title)		Principle of	PHONE	NO. (area code &	no.)
2 CORLE	WBILL	DIR	OFN	1 F G		618.	274-41	000
V. OWNERSHIP	Name and Address of	A MEDIAN	WINGS	1 1 10 av	Visit Visit	45 46 - 48	49 - 54 52	55
		A. NAME OF II	NSTALLATIO	N'S LEGA	LOWNER			11737
8 E T H Y L	CORPO	RATION	بالله		es observes		4444	98
(enter the appropri	OWNERSHIP inte letter into box)	VI. TYPE OF I	HAZARDOU	S WASTE	ACTIVITY (enter "X" in t	he appropriate i	box(es))
F = FEDERA	- 10/1	57 A. GI	ENERATION		□ B.	TRANSPORTA	TION (complete	item VII)
M = NON-FE	56	59	REAT/STORE		60	which can	ND INJECTION	10/2
	TRANSPORTATIO			-	-		STUDE LESS	
A. AIR	B. RAIL	C. HIGHWA	¥	. WATER	E. OTHE	R (specify):		4
	SUBSEQUENT N propriate box to ind		s vour installat	tion's first n	otification of ha	zardous waste a	ctivity or a subser	went potification
	rst notification, ente							
						C.	INSTALLATION	SEPA I.D. NO.
A. FIRST	NOTIFICATION	B. subs	SEQUENT NO	TIFICATIO	ON (complete ite	em C)	LD055	87/376
	ON OF HAZARDO					11111	- ACMAIN	
Please go to the rev	erse of this form and	provide the reques	ted informatio	n.		1161	ט ושטעו ט	

IX. DESCRIPTION OF I	HAZARDOUS WAST	ES (continued from)	front)		
A. HAZARDOUS WASTES waste from non-specific				40 CFR Part 261.31 fo	r each listed hazardo
1	2	3	4	S	6
	NE I	1-1-1-10			1 1 2 2 1 1 2 1
23 26	23 - 25	23 - 26	23 - 25	23 - 26	23 - 26
7	6	9	10	3.1	12
industry of the last of the la					
B. HAZARDOUS WASTES specific industrial sources				R Part 261.32 for each I	listed hazardous waste from
13	3.4	15	16	8.7	18
23 - 26	20 - 25	23 - 26	23 - 26	23 - 26	23 - 26
- Fri		Br. C			
23 2 26	23 7 26	23 - 26	23 2 26	23 - 26	23 - 26
25	26	27	28	2.9	30
					ALL TO TO MAN I
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
C. COMMERCIAL CHEMIC stance your installation h					13 for each chemical sub-
31	32	33	3.4	35.	3,6
23 - 26	23 - 26	25 - 26	23 - 26	23 7 26	23 • 26
37	38	39	40	61	42
			23 26	23 - 26	23 - 26
23 - 26	23 - 26 38	45	A6	47	48
23 • 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
D. LISTED INFECTIOUS V hospitals, medical and res					e from hospitals, veterinary
43	50	51	52	53	54
E. CHARACTERISTICS OF	NON_LISTED HAZAF	RDOUS WASTES Mark	"X" in the boxes corre	esponding to the characte	eristics of non-listed
hazardous wastes your in	stallation handles. (See 4	10 CFR Parts 261.21 -	261.24.)		Figure Constitution
■1. IGNITAL	ale [2. CORROSIVE	□3. REA	CTIVE ***	: 🛛 4. TOXIC
(D001)	(D0	102)	(D003)		(D000)
X. CERTIFICATION					
I certify under penalty attached documents, a I believe that the subm mitting false information	nd that based on my nitted information is	inquiry of those ind true, accurate, and c	lividuals immediatel) omplete. I am aware	responsible for obta	nining the information,
SIGNATURE	- 1		ICIAL TITLE (type or	print)	DATE SIGNED
13 W	Corlow		Corlew ctor of Manu	facturing	8/6/80
			The state of the s		

EPA Form 8700-12 (6-80) REVERSE

*** The toxic characteristic is <u>tentative</u> pending results of laboratory analysis.

DBer GIBUA





May 10, 2002

U.S. EPA Region 5 RCRA Activities 77 West Jackson Boulevard P.O. Box A3587 Chicago, IL 60690



PROGRAM MANAGEMENT BRANCH Waste, Pesticides & Toxics Division U.S. EPA - REGION 5

RE: RCRA Notification of Regulated Waste Activity Subsequent Notification

Dear Sir or Madam:

Please find enclosed a subsequent Notification of Regulated Waste Activity form (EPA Form 8700-12). This notification updates and supercedes the previous notification submitted October 13, 1995. This notification *removes* F-listed code P120, as this waste is not generated by this facility.

If you have any questions, please contact me at (618) 583-1078.

Sincerely,

Edward M. Cox

Environmental Advisor

Cc: Illinois Environmental Protection Agency

Division of Land Pollution Control

1021 N. Grand Avenue E.

Springfield, IL 62794

Encls.



Unit 258 - RECEIVES, LINDANS & MENERGES BUNZENO Unit 270 - USES BATILIM hydroxide & formic Acid Unatt 275- Makic Aydride in batch leadetoes Unit 240-fydeszine is stored wint 290 in Storsyo tanks with secondary condimment

Unit 22 Maleic amydeide betch loaded 1000 RESICTOR

Unitable- Bobuty 1 Alcohol-Storage TANKS

embassysuites.com 800-Embassy



Land and Chemicals Division

Type of Documen	t:	ecklist
	☐ No Violation Letter and Inspection Report/Ch	ecklist
	☐ Letter of Acknowledgment	
	☐ Information Request	
	☐ Pre-Filing and Opportunity to Confer	
	☐ State Notification of Enforcement Action	
	☐ Return to Compliance	
	☐ Other Correspondence- NOD, memo to ORC	
Facility Name: _	Afton Chemical Corporation	
City: Sauget	State:	<u>IL</u>
U.S. EPA ID#:	ILD 055 871 370	
Assigned Staff:	Sheila Burrus Phone:	6-3587

Name	Signature	Date
Author	DieloBurren	3/1/12
Regional Counsel	SEE Attached email	3/1/12
Section Chief	Luma M. Jun	3/7/12
Branch Chief	Jan Wistonine	3/12/12

PM

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

- 1. Date stamp the cover letter;
- 2. Make one copy of the contents of this folder for the official file; Note: original inspection report goes into file room.
- 3. Scan the letter and save the file in the appropriate share drive folder.
- 4. Mail the original certified mail.
- 5. Distribute office copies and cc's and bcc's by email.

Once the certified mail receipt is returned:

- 6. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.
- 7. E-mail staff the date that the letter was received by facility.



Re: Afton Chemical NEIC/Region 5 multimedia Inspection

Susan Perdomo to: Sheila Burrus

03/07/2012 02:59 PM

From:

Susan Perdomo/R5/USEPA/US

To:

Sheila Burrus/R5/USEPA/US@EPA

Sheila - I've been on annual leave since 10:30 today, that's why I asked you to call me at 8:00.

I concur with the NOB, so please feel free to use this email as my sign-off on the NOV, but do not include the inspection report. Kathy confirmed this is alright. Thank you, Susan

----Sheila Burrus/R5/USEPA/US@EPA wrote: ----

To: Susan Perdomo/R5/USEPA/US@EPA From: Sheila Burrus/R5/USEPA/US@EPA

Date: 03/07/2012 01:40PM

Subject: Re: Afton Chemical NEIC/Region 5 multimedia Inspection

Hi Susan,

I left you a message at appropriately 12:30 p.m. at your home. I will stay at my desk to await your returned phone call. I have no additional meetings today.

Thanks

Sheila



To:

Illinois EPA

Cc:

Sheila Burrus/R5/USEPA/US, Gary Victorine/R5/USEPA/US

Bcc:

Subject: Enforcement Action Communication- Afton Chemical Corporation (NOV)

This is to inform you that on or about March 9, 2012, U.S. EPA will send by certified mail, the attached notice of violation (NOV) to Afton Chemical Corporation (Afton) located in Sauget, Illinois The alleged RCRA violations were found during U.S. EPA and the National Enforcement Investigation Center's (NEIC) June 15-21, 2011 multi-media inspection of Afton.

Contact: Sheila Burrus, (312) 886-3587



AftonChemical.NOV.2.27.12.doc

Lorna M. Jereza, Chief Compliance Section 1 RCRA Branch Land and Chemicals Division (LR-8J) U.S. EPA, Region 5, Chicago Telephone: (312) 353-5110

Facsimile: (312) 385-5519



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

MAR 1 6 2012

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL #7009 1680 0000 7667 1477 RETURN RECEIPT REQUESTED

Mr. Rick Williams
Health Safety Environmental and Security
Afton Chemical Corporation
501 Monsanto Avenue
Sauget, Illinois 62201

Re: Notice of Violation Afton Chemical Corporation U.S. EPA ID.: ILD 055 871 370

Dear Mr. Williams:

On June 15 through 21, 2010 representatives of the U.S. Environmental Protection Agency and the National Enforcement Investigations Center (NEIC) conducted a multi-media inspection at Afton Chemical Corporation (Afton), located in Sauget, Illinois. The purpose of the RCRA portion of the inspection was to evaluate Afton's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste.

Based on information provided by Afton personnel, review of records and personal observations made by NEIC and EPA inspector at the time of the inspection, EPA has determined that Afton is in violation of the following requirement of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR):

1. A large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. See, 35 IAC § 722.133(d)(1) [40 CFR § 273.33(d)(1)].

At the time of the inspection, Afton Chemical was storing two 4-foot lamps against a wall and four u-tube lamps were lying out on the back of a small open trailer in the bulb crushing area. The lamps were confirmed to be crushed and contained by Edward Cox later that afternoon.

bcc: Susan Perdomo, ORC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 182004

DE-9J

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Edward M. Cox Manager-Health, Safety, Environmental & Security Afton Chemical 501 Monsanto Ave. Sauget, Illinois 62201

Re:

Compliance Evaluation Inspection

EPA I.D. No.: ILD 055 871 370

Dear Mr. Cox:

On September 17, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Afton Chemical located in Sauget, Illinois (the facility). The purpose of the inspection was to evaluate Afton's compliance with certain conditions and requirements of the Resource Conservation and recovery Act (RCRA); specifically, those conditions related to the Standards Applicable to Generators of Hazardous Waste, Standards for Land Disposal restrictions, and Management of Used Oil set forth at 35 Illinois Administrative Code (IAC), Title 35: Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board, and Title 40 of Code of Federal Regulations (40 CFR) Parts 262, 265, 268, and 279 respectively. Enclosed please find a copy of our inspection report.

As of this writing, based upon information available to U.S. EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes.

If you have any questions or concerns regarding this matter, please contact Derrick Samaranski of my staff at, 312-886-7812.

Sincerely,

Paul Little, Chief

Compliance Section 2

Enforcement and Compliance Assurance Branch

Waste, Pesticides and Toxics Division

Enclosure

cc: Todd Marvel, Illinois EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

77 WEST JACKSON BOULEVARD CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:

Afton Chemical (Ethyl Petroleum Additives)

EPA I.D. No.: ILD 055 871 370

FACILITY ADDRESS:

501 Monsanto Ave.

Sauget, IL 62201

FACILITY TYPE/

PRIORITY SECTOR:

Petrochemical Manufacturing, Chemical Additives

RCRA DESIGNATION:

Large Quantity Generator

NAICS CODE:

32511

DATE OF INSPECTION:

September 17, 2004

FACILITY

REPRESENTATIVES:

Edward M. Cox, Manager-Health, Safety,

Environmental & Security

Dale H. Lyons, Senior Environmental Specialist

Donna Parks Ratkowski, P.E., Senior

Environmental Specialist

U.S.EPA INSPECTOR:

Derrick Samaranski, WPTD, ECAB, CS2

REPORT PREPARED BY:

Derrick Samaranski, Environmental Engineer

REPORT REVIEWED BY:

Paul Little, Chief

Compliance Section 2

WPTD, ECAB

Purpose of Inspection:

This inspection was conducted as a follow-up to the Compliance Evaluation Inspection (CEI) conducted at the facility on June 3, 2003.

Facility Description:

Afton Chemical, formerly Ethyl Petroleum Additives, is a manufacturer of fuel and lubricant additives. Afton produces various organic and synthetic additives for lubricating oils, fluids, and greases for a number of oil markets that include: automotive gear oils, anti-wear oils, metalworking fluids, industrial chemicals, and transmission fluids. The facility also produces fuel additives to enhance octane, reduce emissions, and increase lubricity of: gasolines, diesel, aviation, power generation, and heating fuels. The production and blending of various additive products at the facility is conducted in nine manufacturing units, some of which utilize materials that contain hazardous constituents listed in Appendix H of Section 721 in IAC. Units 258, 270, 275, 290, 267, and 266 either use raw materials containing hazardous constituents or generate final products that contain hazardous waste constituents. Afton identified eleven hazardous constituents that are used in its production processes and they are listed in Table 1.

Appendix H Constituents Used by Afton Chemical	EPA Waste Code	Raw Material	Final Product
Barium Compounds	D005	X	X
Benzene	U018	Х	X
Carbon Disulfide	P022	Х	
Ethylene Glycol Monoethyl Ether	U359	Χ	X
Formic Acid	U123	Х	
Hydrazine	U133	X	
Hydrogen Sulfide	U135		Χ
Isobutyl Alcohol	U140	X	
Lead Trace Amounts	D008	Х	X
Maleic Anhydride	U147	X	
Vandium-Pentoxide	P120	Х	

Table 1: Appendix H Constituents

Unit 258 uses benzene, which is delivered to the facility by a railcar every ten days and is unloaded to a 35,000 gallon storage tank located within a containment area. In addition, the unit reclaims and reuses any unreacted benzene from the three 3,000 gallon batch reactors operating in the unit. Forty million pounds per year of alkyl sulfonic acid (ABSA) intermediate is generated in unit 258 for use in other production units. The ABSA produced in unit 258 is utilized in unit 270 to produce sulfonated products. In

addition to ABSA other feed materials to Unit 270 include barium hydroxide and formic acid. The formic acid is stored in 6,000 gallon storage tank and barium hydroxide is stored in sacks. Units 267 and 275 both utilize maleic anhydride which is batch fed to the reactors. Unit 267 produces gear blends and unit 275 produces polyester copolymer PBSA (polybutylene succinate adipate). Hydrazine, carbon disulfide, and hydrogen sulfide are utilized and stored in unit 290. Isobutyl alcohol is stored in storage tanks in unit 266 and used in reactor vessels in the unit. All the production units are shown on the facility diagram:

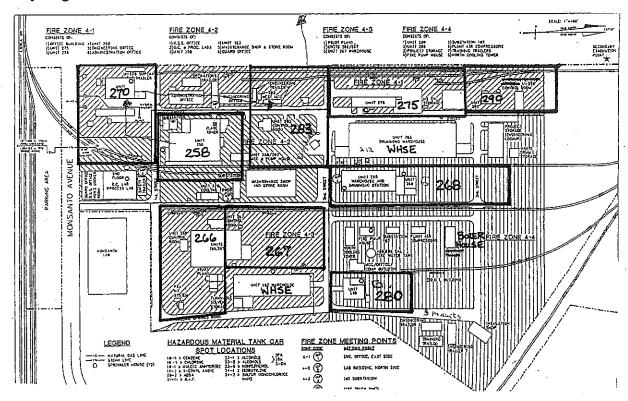


Fig. 1: Facility Diagram

Facility Inspection and Observations:

I arrived at the facility at 9:25am, proceeded to the guard booth, signed in, and asked to speak with Edward Cox, the facility's environmental coordinator. When Mr. Cox arrived I presented my credentials and stated that I was there to conduct a RCRA inspection of the facility. For the opening conference we were joined by Mr. Dale Lyons and Donna Parks Ratkowski. I explained to Mr. Cox, Mr. Lyons, and Mrs. Parks Ratkowski that the purpose of my visit was to conduct a follow-up inspection to the CEI conducted at the facility on June 3, 2003. At the time of the CEI the inspector noted staining on the ground and cement surfaces in the facility's production areas. As a result of the inspector's observations the follow-up inspection focused and the facility's manufacturing areas and process units. Before conducting the walkthrough of the facility I asked Mr. Cox to identify raw materials, intermediates, and final products that contain

hazardous constituents listed in Appendix H of Section 721 in IAC, to determine which production areas to visit. Only those production units identified as managing materials with hazardous constituents were visited.

Mr. Parks Ratkowski described each manufacturing unit of the facility in terms of raw materials, process units, and final products generated by each unit. Based on the description of the manufacturing units and the list of the hazardous constituents obtained by Mr. Cox from the facility's research personnel, six units were identified as managing materials with hazardous constituents. Mr. Lyons provided information on the past spills or releases from each production unit. Afton had a spill of formic acid in unit 270 that occurred during transfer to the storage tank and as a result 25 gallons of material were released. After the facility walkthrough Mr. Lyons showed me the facility's operating record describing the release and action taken to manage it. The material was managed as hazardous waste in the facility's waste water management unit.

The walkthrough portion of the facility inspection began at 1:15pm, after the lunch break. Accompanied by Mr. Cox and Mr. Lyons we first visited unit 258 where the facility receives, unloads and manages benzene. We followed the benzene piping from the unloading area to the storage tank to the process units that utilize and reclaim benzene. No benzene spills or leaks were noted along the process lines, storage tank, and process units. In the benzene/product transfer area I observed dark staining on the gravel underneath the product fill pipe (see picture 1). Mr. Cox explained that the spill has resulted from the transfer of HiTec 614/615 product to a rail tanker car, and that the HiTec 614/615 product neither contained hazardous waste constituents nor would be considered a hazardous waste when spilled or released. Next we visited unit 270. Afton stores and uses barium hydroxide and formic acid in unit 270. At the time of my visit the facility had no barium hydroxide on site and was storing formic acid in a 6,000 gal storage tank. Barium hydroxide is batch fed to the process units. On September 13, 2004 Afton had a release of formic acid during a transfer operation to the storage tank. The released material was rinsed into the facility's waste water management drain and treated in the waste water treatment plant (see picture 2).

Unit 275 utilizes maleic anhydride in batch reactors, and at the time of my visit I observed no visible releases of maleic anhydride around the reactors. Hydrazine is stored in unit 290 in a storage tank that is equipped with a secondary containment filled with water to prevent ignition of the released material. There were no spills or leaks of hydrazine along the piping leading from the storage tank to the process units. However, I observed discoloration of gravel in unit 290 along the rail tracks. Mr. Cox explained that the facility had an oil release from a rail tanker car when the transfer house burst. The release took place approximately three months prior to my visit. Following the inspection of the unit we next visited unit 267, which like unit 275 uses maleic anhydride in its production process. Maleic anhydride is batch loaded into the reactors. No observable releases were noted in the process or malaic anhydride receiving area. The facility walkthrough ended with the inspection of the unit 266 isobutyl alcohol storage tanks, process units and piping used to convey the material to the reactors. No spills or releases were noted in unit 266. The inspection ended with a short closing conference.

Attachments:

1. Inspection Photo Log.

Afton Chemical ILD 055 871 370



Date: September 17, 2004

Time: 1:34 PM

Photographed By: Derrick Samaranski

Photograph Number: 1

Photograph File Name: P1010001

Comments: Product Spill in Unit 258.

Afton Chemical ILD 055 871 370



Date: September 17, 2004

Time: 1:53 PM

Photographed By: Derrick Samaranski

Photograph Number: 2

Photograph File Name: P1010004

Comments: Formic Acid spill area in Unit 270.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604

DATE:

September 19, 2003

FACILITY NAME:

Ethyl Petroleum Additives

ILD 055 871 370

FACILITY ADDRESS:

501 Monsanto Ave.

Sauget, IL 62201

FACILITY CONTACT:

Paul Griffin

Environmental Compliance Manager

618-583-1000

FACILITY TYPE/

PRIORITY SECTOR:

Chemical additives for use in petroleum lubricants.

PBTs:

Not Applicable

REGULATORY

REPRESENTATIVES:

Bryan Holtrop, U.S. EPA - Region 5

DATE OF INSPECTION: June 3, 2003

NAIC CODE:

325998

REPORT PREPARED BY:Bryan Holtrop

REPORT REVIEWED BY: Bryan Holtrop

Purpose of Inspection:

The purpose of the inspection was to conduct a compliance evaluation inspection of the facility to determine its compliance with all applicable RCRA requirements for large quantity generators. Prior to the inspection, I reviewed the facility's files maintained in EPA Region 5 and EPA's RCRAinfo database.

Plant Description

The facility manufactures chemical additives through a series of chemical processes that are used in the production of motor oils. The production process is performed in piping and tanks systems located outdoors.

On-site Observations

I toured the facility site. The tour generally followed the production process and

hazardous waste management process. RCRA records were all kept on-site and were readily available. Containers of hazardous waste were being stored outdoors in two different locations. One behind the laboratory building and the other in an area centrally located on the site. Evidence of spills (pools of free liquid) or releases (soil and ground stains) from the production process were observed.

General Management for Generators

There were several containers of hazardous waste stored on-site at the time of the inspection. Also the facility operated a wastewater treatment facility where the wastewater treatment sludge was managed as a hazardous waste.

Manifests

I conducted a review of the manifest records for the last 3 years. No deficiencies were observed.

Preparedness and Prevention

I reviewed the facility's contingency plan. No deficiencies were observed.

Training Records

I reviewed the facility's training records and program and no deficiencies were found.

Waste Evaluation

The facility generates hazardous wastes from its laboratory operations waste water treatment process and its production processes. No deficiencies were observed regarding the applicable RCRA requirements for waste evaluation.

Pre-Transport

All containers of hazardous waste were closed and labeled as hazardous waste with the dates of accumulations. No deficiencies were observed.

Storage Requirements

At the time of the inspection, the facility was storing several containers of hazardous waste in its central storage area. All the containers observed had been stored for less than 90 days. Containers were inspected weekly. No deficiencies were observed.

Satellite Accumulation

The facility had satellite accumulation areas in the laboratory area and waste water treatment area. No deficiencies were observed.

Tanks

The facility has no hazardous waste storage tanks and none were observed during the inspection.

Comments

It appeared there were leaks and staining of ground and paved areas around some of the production process areas which are all outdoors. Information should be requested from the facility to determine what processes contain hazardous waste constituents and whether there have/are any releases or possibility of releases of such constituents from the facility's production processes. UNITED STATES POSTAL SERVICE

USPS

Permit No. Carto Perm

U.S. EPA

77 W. Jackson Blvd

Chicago, IL 60604

Attn: Derrick Samaranski DE-9J



Waste, Pesticides and Toxics Division

Type of Document:	☑ No Violatio	Violation and Inson Letter and Inson Carter and Inson Carter and Inson Carter and Inson			
Facility Name :	AFTON	CHEMICAL	(ETHYL	PETROLEUM	63VITIGAA
Facility Location:	-501 MG	07W4 C In (
City: 6AUG			State: \L	LINOID	
U.S. EPA ID#_\LD	05587	11370			
Assigned Staff 5 5 8	BICK JYWY	RANDEL	Phone:_	312-886-78	312

Name	Signature	Date
Author	Derrich Scenerander	10/14/04
Regional Counsel		
Section Chief		201504

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

- 1. Date stamp the cover letter;
- 2. Make four copies of the contents of this folder:

One copy for the assigned staff;

One copy for the section file;

One copy for the branch file; and

One copy for the official file copy.

- 3. Make any additional copies for cc's or bcc's.
- 4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

- 5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
- 6. E-mail staff the date that the letter was received by facility.

NOTIFICATION OF TREATMENT FOR CHARACTERISTIC HAZAGO ES WELL SUBMITTED IN ACCORDANCE WITH 40 CER 25 JUL 2 0 1995

GEORGE HAMPER
CHIEF, ILLINOIS SECTION
E.P.A. REGION V
77 WEST JACKSON BLVD., MAIL CODE HRP 8J
CHICAGO, ILLINOIS 60604

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

This notification of treatment of characteristic hazardous waste is submitted in accordance with the notification requirements of 40 CFR 268.7 (FR 55, No. 106, P. 22531, June 1, 1990).

Generator	Ethyl Petroleum Additives
Address:	501 Monsanto Aus
Contact:	Bill williams
Phone:	618.583-1054
EPA I.D.	#: ILD 055871370

The above named facility has contracted with Perma-Fix Sludge Treatment Systems, Inc. to provide on-site treatment of characteristic hazardous wastes in accordance with the provisions of 40 CFR 262.34, 268.7, 268.9. This waste is not a listed waste and will be treated within the generator's 90 day accumulation period.

day accumulation period.
Waste Stream Name: Stabilized geaus!
Process Generating Waste: founds red moter containing Lend of CAdmium compounds were Blown over ferreduring Storm. And fellon gravel. This gravel was treated by Perma-178 And Rendered NON haz.
Container Type: Roll off doxes
(X) One-Time estimated volume: 40-45 yds. () On-Going generation:
Characteristic waste code(s): Docio Don8
Treatment Use: () Neutralization () Cyanide destruction () Stabilization () Solidification

314 997 59<u>17</u>

WASTE ANALYSIS PLAN FOR TREATED CHARACTERISTIC HAZARDOUS WASTE SUBMITTED IN ACCORDANCE WITH 40 CFR 267.8 (FR 55, NO. 106, P. 22670, JUNE 1, 1990)

waste Name: Stabilized 91AUE!				
Generator: Ethyl Petroleum Additives				
Analysis on a representative sample of untreated waste:				
it contained CARMIUM + READ.				
Testing on treated sample of waste:				
SEE AHACheda				
Analysis of treated waste:				
Waste Code Untreated Waste: Treatment Limits:				
D006 1.ppm D008 5.ppm				
Certification: Random samples of treated waste will be tested before it is shipped to a subtitle D landfill.				
I certify under penalty of law, that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268.32 or RURA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.				
Generator: Ethyl Perfroleum Addities Phone: 618 583-1054				
Contractor Tech. Contact: Jay Taylor Perma-Fix, Inc. 1525 N. 105 E. Avenue				

Tulsa, Oklahoma 74116-1515

(918) 836-0700

SUDTITLE	D	racility	Likell.	MITT	Tecerve	CHE	W. CD C C .	
in he of c		Marist	mila	ina				

601 mad son Rd.

This waste will be treated and sampled in accordance with the attached sample plan.

Authorized Generator Signature:

Printed Name: Bill Williams

Title: Div. Mar

Date: 17-11-95

Attachments:

1. Waste analysis plan

2. Laboratory analysis of untreated waste

3. Analysis of treated waste (Perma-Fix conducted pilot study)

Contractor technical contact:

Jay Taylor Perma-Fix, Inc. 1525 N. 105 E. Avenue Tulsa, Oklahoma 74116-1515

Telephone # 918-836-0700

Methab Testing Services, Inc.

MLTS# 95-6775

SAM# 95-06-484

DATE COLLECTED: 06/12/95 DATE RECEIVED: 06/13/96

ATTH: WENDELL CLARK

PERMA-FIX

CONTACT GEORGE PO# TUL 50076

COLLECTED BY: NOT SPECIFIED

In accordance with your instructions, chemical analysis was performed on a sample submitted from your company on the above date. The results of the analysis are listed below.

STABLE CONTAMINATED SOIL JUM CARBONATE

ASPPOINT CLOSED-CUP

Laucous

SAMPLE 10

PARAMETER

RESULTS

STINU

AMALYST

AMALYZED

METHOD

06/23/9 06/27/9 06/16/95 ISTM D-3174 MSPECIFIE W846 9012

Marka Marka

Ceg |

Si Car

06/15/9 6/26/9

TM D-93 TM 2216-92

06/19/9 N846-9066

MSPECIFIE 4846 - 9095NB46-9040

Ro/Ko

Should you have any questions, please feel free to call.

Approved by:

Vice President TSIIU

Dated: 06/27/95

*Z WON-REACTIVE 50076 ETHYL PETROLEUM STABILIZED CONTAMINATED SOIL/GRAVEL

COMMENTS:

SURROGATE DILUTED OUT.

INDIANA **₩** LOUISIANA アスのの表 D T O R I M S

OKLAHOMA

Metlab Testing Services, Inc. 918-234-7111 •

800-324-5767 • Environmental Division Fax 918-234-7152

10835 E. Independence, Sulte 102 ...

Tulsa, Oklahoma 74116-5873

MLTS# 95-5776 SAM# 9506404-01A

DATE COLLECTED: 06/12/95

DATE RECEIVED: 06/13/95

CONTACT GEORGE

STABLE CONTAMINATED SOIL

ATTN: KENDELL CLARK

PERMA-FIX

COLLECTED BY: NOT SPECIFIED

PCB'S BY EPA METHOD 8080

PARAMETER RESULT

AROCLOR-125 AROCLOR-1260 AROCLOR-124E AROCLOR-124 AROCLOR-1232 AROCLOR-122 AROCLOR-1016

SURROGATE % RECOVERY

Notes and Definitions:

MATRIX

INSTRUMENT

ANALYST

06/13/95

EXTRACTED ANALYZED

Sampling Information:

QA/QC RESULTS

PARAMETER AROCLOR-1254

DUPA

BANG

RECOVERY

CUPLICATE

Results obtained from a sample in the same batch.

This sample has a detection limit of 1.00

Approved by:

Vice President beorge A. Dust

Dated: 06/27/95

INDIANA SIERRA LOUISIANA LABORATORIES

OKLAHDMA

Methab Testing Services, Inc.

10835 E. Independence, Sulte 102 • Tuisa, Oklahoma 74116-5873 918-234-7111 • 800-324-5757 • Fax 915-234-7152

Erykanmental Distaton

MLTS# 9E-5775

SAM# 2506484-01A

DATE RECEIVED: 06/13/95

ATTN: WENDELL CLARK

PERMA-FIX

COLLECTED BY: NOT SPECIFIED

DATE COLLECTED: 06/12/95

CONTACT GEDRGE ID STABLE CONTAMINATED SOIL

TCLP METALS RESULTS

R RESULT ANALYST ANALYZED MCL(119/1) -0.50 0.25 0.02 0.02 0.02 0.02 0.01 0.02 0.01 0.02 0.01 0.02 0.01 0.02 0.01 0.02 0.02	PARAMETER ARSENIC	CACHIUM		ARCURY	SELENIU	
MALYZED MCL(mg/l) 06/22/95 5.00 06/27/95 1c0.00 06/27/95 5.00 06/27/95 5.00 06/27/95 0.20 06/27/95 1.00	, , , , , , , , , , , , , , , , , , ,					
1.00 SW 5.00 SW 5.00 SW 5.00 SW 5.00 SW 5.00 SW 5.00 SW	WALKST			[]	M	HAC
	MN/ALYZED	06/21/95	06/27/95	06/15/95	06/27/95	05/97/QK
NE WEST OF SUB46-6010 SUB46-6010 SUB46-6010 SUB46-6010 SUB46-6010 SUB46-6010 SUB46-6010	MCL(mg/]) 5.00	00.1	5.00 5.00	0.20	1.00	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	METROD SUB46-6010	SN846-6010	SW846-6010	SW846-7470	SW846-6010	SV846-6010

MCL: Maximum Concentration Limit

Results in mg/l in the EXTRACT

DATE EXTRACTED 06/14/95

COMMENTS: INITIAL PH-9.86

Should you have any questions, please feel free to call.

Approved by:

deorge

Dated: 06/27/95

Vice Fresident

NO - NOT DETECTED AT DETECTION LIMIT NO* - NOT DETECTED AT DETECTION LIMIT

OKLAHOMA

Metlab Testing Services, Inc.

10835 E. Independence, Sulte 102 • Tutsa, Oklahoma 74116-5673 918-234-711 • 800-324-5757 • Fax 918-234-7152

Environmental Division

SAM# 9506484-01A

CONTACT GEORGE

ID STABLE CONTAMINATED SOIL

YCLP VOLATILE COMPOUNDS EPA METHOD 8260

DATE COLLECTED: 06/12/95

DATE RECEIVED: 06/13/95

MLTS# 95-5775

COLLECTED BY: NOT SPECIFIED

ATTN: HENDELL CLARK

PERMA-FIX

BENZENE CARBON TETRACHLORIDE CARBON TETRACHLORIDE CHLOROFORN 1,2-DICHLOROETHANE 1,1-DICHLOROETHENE METHYL ETHYL KETONE TETRACHLOROETHENE TRICHLOROETHENE VINYL CHLORIDE	PARAMETER
SSS SSS SSS SSS SSS SSS SSS SSS SSS SS	RESULI
0.50 0.50 6.0 0.60 0.70 0.7	RCRA LIMII (ppm)

DETECTION LINITS:

Approved by:

Results obtained from a sample

in the same batch

CHLOROBLINZENE

BENZENE

RICHLOROETHENE , 1-DICHLORGETHENE PARAMETER

QA/QC

RESULTS

DUPLICATE

SPIKE X RECOVERY

Vice President

Dated: 06/27/95

COMMENTS:

PARAMETER

RESULT

RCRA LIMIT (pom

TCLP SENIVOLATILE COMPOUNDS

EPA METHOD 8270

DATE COLLECTED: 06/12/95

DATE RECEIVED: 06/13/95

CONTACT GEORGE

ID STABLE CONTAMINATED SOIL

200.1

PARAMETER

AQUG

Brquq

RECOVER SPIKE %

505

DUPLICATE

QA/QC

RESULTS

O-CRESOL

0-CRESOL 1,4-DICHLOROGENZENE <u>48</u>

COLLECTED BY: NOT SPECIFIED

ATTAL HENDELL CLARK

PERMA-FIX

M & P-CRESOL

Units

PPM

Analyzed 06/21/95

Analyst DSP

Extracted 06/16/95

ND - Not detected at detection limit 0.02

Notes and Definitions

SURROGATE

%RECOVERY

SURROGATE

KRECOVERY

ACID EXTRACTABLES

NITROBENZENE-05 2-FLUOROBIPHENY

2-FLUOROPHENOL

PHENOL-D6

2,4,6-TRIBROMOPHENOL

FERPHENYL-D14

BASE/NEUTRAL EXTRACTABLES

2,4,5-TRICHLOROPHENOL

PYRIDINE

NITROBENZENE PENTACHLOROPHENOL

100,

Results obtained from a sample in the same batch

SURPOGATES

HEXACHLOROBENZENE

IEXACHLOROBUTAD I ENE , 4-DINITRCTOLUENE 4-DICHLOROBENZENE

EXACHLOROETHANE

2,4,6-TRICHLOROPHENOL

INDIANA Im NN N LOUISIANA LABORATOR-ES

OKLAHOMA

Methab Testing Services, Inc.

10835 E. Independence, Sulte 102 • Tulse, Oktahoma 74116-5673 \$18-234-7111 • 800-324-5757 • Fax 918-234-7152

Environmental Dariston

MLTS# 95-5776 SAM# 9506484-01A

guidelines unless otherwise noted.

All QA/QC results shown are within EPA

Comments:

Approved by:

George Vice President Dust

Dated: 06/27/95



MAR 14 19 NOTICATION FICE

NOTIFICATION OF TREATMENT FOR CHARACTERISTIC HAZARDOUS WASTE SUBMITTED IN ACCORDANCE WITH 40 CFR 268.7

GEORGE HAMPER
CHIEF, ILLINOIS SECTION
EPA Region V
77 WEST JACKSON BLVD., MAIL CODE HRP 8J
CHICAGO, ILLINOIS 60604



OFFICE OF RCRA'
WASTE MANAGEMENT DIVISION
EPA, REGION V

¥ 10.

This notification of treatment of characteristic hazardous waste is submitted in accordance with the notification requirements of 40 CFR 268.7 (FR 55, No. 106, P. 22531, June 1, 1990).

Generator: ETHYL PETROLEUM ADDITIVES, INC. Address: ETHYL PETROLEUM ADDITIVES, INC.

501 MONSANTO AVENUE SAUGET ILLINOIS 62201

Facility contact: DONNA PARKS

Phone: 618-583-1388 1323

EPA I.D. Number: ILD 055871370

The above named facility has contracted with Perma-Fix Sludge Treatment Systems, Inc. to provide on-site treatment of characteristic hazardous wastes in accordance with the provisions of 40 CFR 262.34, 268.7 and 268.9. This waste is not a listed waste and will be treated within the generator's 90 day accumulation period.

Waste stream name: BARIUM PRESS CAKE	-
Process generating waste: FILTRATION OF PRODUCT	
CONTAINER TYPE: 55 GALLON DRUM () One-time estimated volume: (X) On-going generation: 60-80 YRDS. PER YEAR	TIFIED LOU OUB AND MESTED
Characteristic waste code(s): D005 Treatment use: () Neutralization () Cyanide destruction	CER P P P P P P P P P P P P P P P P P P P
(X) Stabilization (X) Solidification () Other	

Subtitle D facility that will receive the waste:

LAIDLAW WASTE SYSTEMS BRIDGETON FACILITY
13570 ST LOUIS ROAD
BRIDGETON MISSOURI 63044

This waste will be treated and sampled in accordance with the attached sample analysis plan.

Authorized generator signature:

Jonna K. Parks

Printed name and title:

DONNA PARKS ENVIRONMENTAL ENG.

Date: 3/7/94

Attachments:

1. Waste analysis plan

2. Laboratory analysis of untreated waste

3. Analysis of treated waste (Perma-Fix conducted pilot study)

Contractor technical contact:

Stephen F. Smith Operations Manager Perma-Fix, Inc. 2272 Lackfee Road Maryland Heights, MO. 63146

Telephone. (314) 997-5899

WASTE ANALYSIS PLAN FOR TREATED CHARACTERISTIC HAZARDOUS WASTE SUBMITTED IN ACCORDANCE WITH 40 CFR 267.8 (FR 55 NO. 106, P. 22670, JUNE 1, 1990)

WASTE NAME: BARIUM PRESS CAKE	
Generator: ETHYL PETROLEUM ADD	DITIVES INC.
	YE SAMPLE IS ATTACHED. GENERATOR SS THAT THE WASTE DOES NOT CONTAIN
Testing on untreated waste: A RANDOM SAMPLE WILL BE TAKEN PER TESTED FOR BARIUM USING THE TESTED FOR BARIUM USING	
Analysis of treated waste:	
Waste Code on Untreated waste:	Treatment Limits
D005	LESS THAN 100.00
and am familiar with the treatment of the treatment process used to and that, based on my inquiry of responsible for obtaining this treatment process has been operated as to comply with the perform CFR 268.32 or RCRA Section 3004	that I have personally examined ent technology and operation of support this certification, if those individuals immediately information, I believe that the lated and maintained properly mance levels specified in 40 (d) without impermissible dilution aware that there are significant electification, including the
Generator Contact: DONNA PARKS	Phone: 618-538-1388 1323
22 Ma	tephen F. Smith perations Manager 272 Lackfee Road aryland Heights, Missouri 314) 997-5899

GENERATORS KNOWLEDGE OF PROCESS

TO:
FROM: ETHYL PETROLEUM ADDITIVES, INC.
RE: GENERATORS KNOWLEDGE OF PROCESS CERTIFICATION OF THE ABSENCE OF HERBICIDES, PESTICIDES, VOLATILES AND SEMI-VOLATILES.
BY KNOWLEDGE OF PROCESS, ETHYL PETROLEUM ADDITIVES, INC. CERTIFIES THAT THERE IS NO PRESENCE OF HERBICIDES, PESTICIDES, VOLATILES OR SEMI-VOLATILES LISTED IN 40 CFR PART 261.24 IN THE BARIUM PRESS CAKE WASTE WHICH WE INTEND TO SHIP TO LAIDLAW WASTE SYSTEMS FOR DISIPOSAL.
SIGNATURE Conna K. Parks TITLE ENVIRONMENTAL ENG.
NAME (PRINT OR TYPE) DONNA PARKS DATE 3/7/94
COMPANY NAME ETHYL PETROLEUM ADDITIVES INC.
COMPANY ADDRESS 501 MONSANTO AVE.
SAUGET, ILLINOIS 62201
PHONE NUMBER (618) 583- 1388 /323

GENERATOR CERTIFICATION FORM

THIS CERTIFICATION FORM MUST BE COMPLETED BEFORE YOUR REQUEST TO DISPOSE OF NON-HAZARDOUS INDUSTRIAL WASTE CAN BE APPROVED.

"I CERTIFY THAT THE WASTE DESCRIBED IN THIS AND ATTACHED DOCUMENTS IS NOT A LISTED HAZARDOUS WASTE AS DESCRIBED BY 40 CFR 261 SUBPART D, AND THE WASTE IS NOT CONTAMINATED WITH A LISTED WASTE. I FURTHER CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED UPON MY INQUIRY OF THESE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFCANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT."

GENERATOR'S NAME AND LOCATION ETHYL PETROLEUM ADDITIVES
501 MONSANTO AVE. SAUGET, ILLINOIS 62201
TYPE AND QUANITY OF WASTE BARIUM PRESS CAKE
60-80 CUBIC YARDS PER YEAR
GENERATOR'S SIGNATURE Donna K Parks
NAME AND OFFICIAL TITLE (TYPE OR PRINT) DONNA PARKS
ENVIRONMENTAL ENGINEER
DATE SIGNED 3/7/94

FOR FURTHER INFORMATION CONTACT:

PERMA-FIX ENVIRONMENTAL SERVICES, INC. 2272 LACKFEE ROAD MARYLAND HEIGHTS, 63146 (314)997-5899



BATES LAB

207 LAKE DRIVE SOUTH * PO BOX 876 SAND SPRINGS, OKLAHOMA 74063 Ph: (918) 245-0281

<u>Client:</u> Sample I.D.: Bates Lab I.D.; Date Received: Date Reported:

Perma Fix St. Louis 012 Ethyl Petr Raw Barium Filter Cake 940085 2-03-94 2-08-94

Parameter TCLP Ag TCLP As TCLP Ba TCLP Cd TCLP Cr TCLP Hg TCLP Pb	Result <0.05 mg/l <0.1 mg/l 133.0 mg/l 0.44 mg/l <0.05 mg/l 0.0027 mg/l <0.1 mg/l	Date and Time 1-19-94 1355 1-19-94 1100 2-08-94 1000 1-19-94 1330 1-18-94 1410 1-18-94 1245 1-19-94 1345	Analyst MM MM MM MM MM MM MM MM MM ZA MM
TCLP Se	<0.1 mg/1	1-21-94 1300	MM

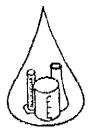
Methods are in Compliance with 40 CFR, Part 136 or SW 846

Parameter	Method Number
Ag	272.1
As	20 6.2
Ba	208.2
Cd	213.1
Cr	218.1
Нд	245.1
PĎ	239.1
Se	270.2

Quality Control/Quality Assurance

Sample No.	Item	Kesult	Dupl.	%Diff	%Spike Recovery
940065	Ag	<0.05	<0.05	0.0%	87.0%
940085	As	<0.1	<0.1	U. U%	81.48%
940190	Ba	<0.1	<0.1	0.0%	86.0%
940085	ಿ ನ	0.42	0.45	6,678	94.77%
940085	Cr	<0. 05	<0.05	0.0%	80.0%
940085	₽b	<0.1	<0.1	U. U%	100.0%
940085	S ¢	<0.1	<0.1	0.0%	92.8%

1



BATES LAB

207 LAKE DRIVE SOUTH * PO BOX 876 SAND SPRINGS, OKLAHOMA 74063 Ph: (918) 245-0281

Sample I.D.:
Bates Lab I.D.:
Date Received:
Date Reported:

Perma Fix St Louis 012 Ethyl Petr Stab Filter Cake 940288 2-14-94

2-16-94

Parameter TCLP Ba Result mg/1

Date and Time 2-16-94 1130 Analyst MM

Methods are in Compliance with 40 CFR, Part 136 or SW 846

<u>Paramoter</u> Ba Method Number 208.2

Quality Control/Quality Assurance

Sample No. 940288

<u>Item</u> Ba Result 0.41 Dupl.

%Diff 2.38% *Spike Recovery 85.0%

Marcia H. Bates, Ph. D. PE

BATES LAB

207 LAKE DRIVE SOUTH * PO BOX 876 SAND SPRINGS, OKLAHOMA 74063 Ph: (918) 245-0281

Client:

Perma Fix

Sample I.D.:

St. Louis 012 Ethyl Petr. Stab Ba Press Cake

Bates Lab I.D.: Date Received:

932552

Date Reported:

12-30-93 1-14-94

<u>Parameter</u>	
MCID No	

Parameter	Result		Date and	<u>Time</u>	Analyst
TCLP Ag	<0.05	mg/1	1-05-94	1410	MM
TCLP As	<0.1	mg/1	1-10-94	1100	MM
TCLP Ba	0.29	mg/1	1-05-94	1500	MM
TCLP Cd	<0.05	mg/1	1-05-94	1345	MM
TCLP Cr	<0.05	mg/1	1-05-94	1255	MM
TCLP Hg	<0.0002	mg/1	1-04-94	0930	ZA
TCLP Pb	0.17	mg/1	1-05-94	1045	MM
TCLP Se	<0.1	mg/1	1-12-94	1130	MM
Sulfide Reactivity	<0.012	mg/kg	1-10-94	1700	ZA
Cyanide Reactivity	<0.5	mg/kg	1-04-94	1500	MM
Corrosivity	7.2	SU	1-12-94	1410	MM
Ignitability	>220°F		1-10-94	1000	MM

Methods are in Compliance with 40 CFR, Part 136 or SW 846

<u>Parameter</u> Ag As	Method Number 272.1 206.2
Ва	208.2
Cd Cr	213.1 218.1
Hg Pb	245.1 239.1
Se Sulfide	~270.2
CN Ignitability	9030, 376.2 9010, 335.2 1010
Corrosivity	9045

Marcia H. Bates, Ph. D. PE

BATES LAB

207 LAKE DRIVE SOUTH * PO BOX 876 SAND SPRINGS, OKLAHOMA 74063 Ph: (918) 245-0281

<u>Client:</u>

Perma Fix

Page 2

Sample I.D.:

St. Louis 012 Ethyl Petr. Stab Ba Press Cake

Bates Lab I.D.: Date Received:

932552 12-30-93

Date Reported:

1-14-94

Quality Control/Quality Assurance

Sample No. 932552	<u>Item</u> Ag	Result <0.05	<u>Dupl.</u> <0.05	<u>%Diff</u> 0.0%	%Spike Recovery 89.0%
932552	As	<0.1	<0.1	0.0%	115.0%
932552	Ва	0.28	0.29	3.45%	101.3%
932552	Cd	<0.05	<0.05	0.0%	87.0%
932552	Cr	<0.05	<0.05	0.0%	90.0%
932515	Hg	<0.0002	<0.0002	0.0%	
932544	Hg				112.0%
932552	Pb	0.17	0.17	0.0%	85.47%
932552	Se	<0.1	<0.1	0.0%	84.8%
932553	Sulfide	<0.011	<0.011	0.0%	
	Reactivity	•			
932544	Cyanide	<0.0002	<0.0002	0.0%	
	Reactivity				
932552	Corrosivity	7.1	7.2	0.0%	
932552	Ignitability	>220°F	>220 ⁰ F		

Marcia H. Bates, Ph. D. PE

89 AUG 1988

Mr. Mike Bonaventure Environmental Supervisor Ethyl Petroleum Additives, Inc. Monsanto Avenue Sauget, Illinois 62201

> Re: Land Disposal Restrictions Ethyl Petroleum Additives, Inc. ILD 055 871 370

Dear Mr. Bonaventure:

On June 21, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for FOO1-FOO5 spent solvents became effective on November 8, 1986, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271) and for "California List" hazardous wastes on July 8, 1987, (52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

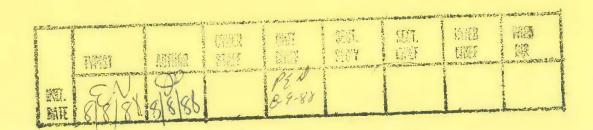
If you have any questions regarding this correspondence, please contact Ms. Janet Haff of my staff at (312) 353-7923.

Sincerely yours,

Paul E. Dimock, Chief IL/MI/WI Enforcement Section

Enclosure

cc: Harry Chappel, IEPA Glenn Savage, IEPA



RCRA LAND DISPOSAL RESTRICTION INSPECTION

	Facility:	Ethyl	Petrole	um Additi	ves Inc.
	U.S. EPA I.D. I	No.: The	0558	77/376	LPC 1631210013
	Street:	Tonsanto	Ave.		100
	City: Sa	uget	State:	IL	Zip Code: 67701
	Telephone:	618/	274-	4000	
	Operator:	Same as	above	0	
	Street:				
	City:		State:		Zip Code:
	Telephone:				
	Owner:	Ethyl C	orpora	tion	
	Street:	451 Flo	ocida		
	City: B	itan Rouge	State:	LA	Zip Code: <u>7080</u>
	Telephone:				
	Inspection Da	te: 6/2/188Ti	me: 101000ms	205pm Weather Con	ditions: 95° dry
		Name	Aff	iliation	Telephone
	Inspectors:	LikndySc	hausella	erger IEPA	618/345-4606
		Randy B	sallard	IEPA	618/345-44,06
	Facility Repr	esentatives:	Mike	Bonaventure	Env. Supervisor
			Chris	sta Andrew	Chemical Engineer
		RO	CRA Status		DR Status
			X	F-Solvent	California List
C		enerator			
S. Ed		ansporter			Δ.
U.S. EPA, REGION	JUL 25 1988 OFFICE OF RCRA				The Con
-Glov	1988 1988				
U.S. EPA, REGION		sposer			Revised 11-03-87
ž				1	Revised 11-03-87

1631210013 - St. Clair County Sauget/Ethyl Petroleum Additives ILD055871370

REMARKS

Ethyl Petroleum Additives, Inc. utilizes various processes to produce different grades of additives for petroleum products such as motor oil and transmission fluid. The processes at Ethyl are operated intermittently depending upon the demand for products by clients. This results in variable generation rates of hazardous wastes.

The following waste streams, Naptha drains, spent kerosene, waste pinene, and waste dicyclopentadiene are all hazardous for ignitability. This determination was made through knowledge of the wastes and the processes in which they are utilized. The Naptha is reclaimed by Safety Kleen and the kerosene, pinene and dicyclopentadiene are shipped to LWD in Calvert City, KY for disposal. An off-spec petroleum additive is infrequently generated. The product becomes off-spec when a malfunction in a sensitive process occurs. The process consists of reacting lime with alkyl benzene sulfuric acid and the addition of solvents to maintain viscosity. Results of analysis dated 2/8/88 characterized the waste as being hazardous for ignitability (D001). It is shipped to Solvent Resource Recovery in West Carollton, OH for reclamation.

Spent acid sludge (D002) was a one time generation, and was disposed of at LWD. The filter cake (D005) consists of diatomaceous earth and is used in a process to filter out barium. It is shipped to PDC in Peoria for disposal. The lab wastes (F003) are generated by cleaning lab equipment. A satellite accumulation area near the lab is used for collection of this waste. It is disposed of at LWD. Methanol (U154) and benzene (U019) are both generated as process wastes at variable rates. They are also disposed of at LWD.

The hazardous wastes are stored on site in drums for less than 90 days. The drum storage area consists of a curbed concrete pad with a drain and closed sump. The area lies under a canopy. (See photo #2) The satellite accumulation area consists of a curbed concrete pad and the drums are set on a pallet. (See photo #1) Four drums can be seen in photo #1, but only one is currently being filled. The other three drums are empty.

A review of the paperwork and a tour of the facility revealed no apparent violations during this inspection.

WGS:j1r/21

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	٠			Gen.	Treat	Store	Disp.	Trans.
4 .	<u>F-S</u>	olvent Was	<u>tes</u>					
	1.	F001						
	2.	F002						
	3.	F003		$\overline{\lambda}$				
	4.	F004			·			
	5.	F005						
		Note:	Use Append misclassifyir			ther the fa	acility is	. *

California List Wastes В.

Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

	Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L				
Cadmium	100 mg/L			·	
Chromium VI	500 mg/L		· ·		
Lead	500 mg/L			· .	
Mercury	20 mg/L _n				··
Nickel	134 mg/L				
Selenium	100 mg/L				<u> </u>
Thallium	130 mg/L				
	3			Revised	11-03-80
(Pg. 3)					

2.	Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L						
	·	Gen.	Treat	Store	Disp.	Trans.	
3.	Liquid hazardous	waste that has a	pH of less	than or ec	qual to 2.0		
4.		waste that conta 50 ppm 500 ppm cility mix liquid Bs with other typ	hazardous	waste that		 	
	If yes, state	Yes		No	NA		
5.	Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L						
	Note: The prohib waste is also subj specific HOC.						

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

		lvent Wastes: Does the generator correctly determine the opriate treatability group of the waste?
		Yes No NA
	lf ye	es, check the appropriate treatability group.
		Wastewaters containing solvents (less than or equal to 1% TOC by weight) Pharmaceutical wastewater containing spent methylene chloride All other spent solvent wastes
2.		fornia List Wastes: Does the generator correctly determine appropriate treatment standard of the waste?
	а.	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
		Yes No NA
		If yes, specify the method:
	b.	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?
		Yes NoNA
		If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

Revised 11-03-87

В.	Wast	e A	nal	ysi	5
					_

1.	F-Solvent Wastes							
	a.	Does the generator determine whether the F-solvent waste exceeds treatment standards?						
		Yes No NA						
		How was this determination made?						
		- Knowledge of waste						
		No						
		If yes, note how this is adequate: Lab solvents Lab waste Listed waste						
		- TCLP Yes No						
		If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.						
	b.	Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?						
		Yes No NA						
		If yes, specify the waste stream: Food Lab waste Solvents						
	c.	Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?						
		Yes No NA						
	d.	How does the generator test F-solvent waste when a process or waste stream changes?						
2.	California List Wastes							
	a.	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?						
		Yes No NA						
		6 Revised 11-03-87						

	Yes No NA
	at type of absorbent is used? ck the types of waste to which absorbent is
	Liquid hazardous waste having a pH less than or equal to 2
	Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
	Liquid hazardous waste containing metals
	Liquid hazardous waste containing free cyanides
ext lev	es the generator determine whether the concentration levels (not ract or filtrate) in the waste equal or exceed the prohibition els or whether the waste has a pH of less than or equal to 2.0 sed on:
-	Knowledge of wastes
	Yes No NA
	If yes, note how this is adequate:
-	Testing Yes No NA
	If yes, list test method used:
	es the generator determine if concentration levels in PFLT extra
	es the generator determine if concentration levels in PFLT extraceed cyanide and metals concentration levels? Yes No NA If yes, list test method used and constituent and concentration
	es the generator determine if concentration levels in PFLT extraceed cyanide and metals concentration levels? Yes No NA If yes, list test method used and constituent and concentration
ex d	es the generator determine if concentration levels in PFLT extra ceed cyanide and metals concentration levels?

C. Management

1.	On-S	Site Management
	or d	aste that exceeds the treatment standards treated, stored, isposed on-site? Yes No flowever, it is stored for less than 90 days
	11 ye	es, the TSD Checklist must be completed.
2.	Off-	Site Management
	a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
		Yes No
		If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]? Yes No
		If yes, does notification contain the following?
		EPA Hazardous waste number(s) Yes No
	•	Applicable treatment standards Yes No
		Manifest number Yes No
		Waste analysis data, if available Yes No NAX
		Identify off-site treatment or storage facilities: LWD, Calvert of waster at waster
	b.	Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?
		Yes No
		If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?
		Yes No

8

Revised 11-03-87

	if yes, does notification contain the following	•	
	EPA Hazardous waste number(s)	Yes	No
	Applicable treatment standards	Yes	No
	Manifest number	Yes	No
	Waste analysis data, if available	Yes	No
	Certification that the waste meets treatment standards	Yes	No
	Identify off-site land disposal facilities:		
	(268.5), or petition (268.6), does the gene provide notification to the off-site disponent that the waste is exempt from land disponent restrictions [268.7(a)(3)]? Yes Yes N	osal facility osal	N) A
	i es iv	0	NA
Treatme	ent Using RCRA 264/265 Exempt Units or 1	Processes	
(i.e., boi	lers, furnaces, distillation units, wastewate ent tanks, elementary neutralization, etc.)	r	
(i.e., boi treatm Ar	lers, furnaces, distillation units, wastewate ent tanks, elementary neutralization, etc.) e treatment residuals generated from units der RCRA 264/265? Yes	or processes ex	cempt

Revised 11-03-80,



Environmental Protection Agency

113 W. Main Street Collinsville, IL. 62234

618/345-4606

Refer to: St. Clair County - ILD055871370 - Sauget/Edwin Cooper, Inc.

January 20, 1982

RECEIVED

Edwin Cooper, Inc. Monsanto Avenue Sauget, Illinois 62201

WASTE MANAGEMENT BRANCH

ATTN: James Sparks

Dear Mr. Sparks:

An inspection of the above facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on November 30, 1981. The inspection was conducted under the authorization of the United States Environmental Protection Agency (USEPA). A copy of the inspection report is enclosed. The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) as amended. We are pleased to report that your facility was found to be in compliance.

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report, please contact Diane M. Spencer at the above number.

Sincerely.

Kenneth G. Mensing, Southern Region Manager

Land Field Operations Section

Kenneth & mensing

Division of Land/Noise Pollution Control

DMS: ilr

Enclosure: Inspection Report

cc: Division File

Southern Region

Region V: USEPA

STATE IDENTIFICATION NUMBER (If Applicable)

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS Form B Generator Inspection* (40 CFR Part 262)

I. General Information:*

(A)	Installation Name: EDWIA	U COOPER	INC.	
	Street: MONSANTO	-		
	City: SAUGET		ILLINOIS	(E) Zip Code: <u>62201</u>
	Phone: 618/274-4000			
(H)	Date of Inspection: 11-30-	8/ Time of	Inspection (From)	9:00 a.(To) 12:10 p.
(I)	Weather Conditions: RAI	NING, WIN	VOY, \$35°	· · · · · · · · · · · · · · · · · · ·
!				
(J)	Person(s) interviewed	Title		Telephone
	JIM SPARKS	ENUIR.	TECHNICIAN	618/274-4000
	RICH RUTHERFORD	SAFET	Y DIRECTOR	618/274-4000
	SAM McWILLIAMS	PLANT	MANAGER	618/274-4000
(K)	Inspection Participants	Agency/Ti	tle	Telephone
	JIM SPARKS	EDWIN C	OOPER LENV. TECH	1. 618/274-4000
	DIANE SPENCER	1.E.P.A.	•	618/345-4606
(L)	Preparer Information			
`				
•	Name	Agency/Title	Tele	epho ne
	<u>DIANE M. SPENCER</u> not use this form if Generator mplete form "A" if the Generato	is also a treat	ment, storage, and,	18 / 345-4606 for disposal facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

	EDWIN COOPER, INC. 15	A DIVISION OF E	THYL CORPORA	TION. SEVERAL
WI	ASTES GENERATED AT THE	SITE ARE HAZAR	DOUS DUE TO	IGNITABILITY
ID	001). HAZARDOUS WASTES	S ARE NOT PRODU	UCED ON A REG	ULAR BASIS.
	THER, SERTAIN WASTES A			
	E BEING PRODUCED. AT			
	,	THE THE OF THE	e mosi e ciron,	MEALLOUS
W	9STE WAS PRESENT.			
	* .		2	
	III. M	MANIFEST REQUIREMENTS (Subpart B)	2	
		Yes No NI	* Remarks	
	s the operator have copies the manifest available for			
	iew?		WASTES SH	IPPED TO FOR INCINERATION
			ARKANSAS I	-OR INCINERATION
	the manifest forms reviewed tain the following information?	?		
(If	possible, make copies of, or			
tha	ord information from, manifests t do not contain the critical ments)	S		
1.	Manifest document number?			
2.	Name, mailing address, telephonumber, and EPA ID number of generator?	one		
		· -		
3.	Name and EPA ID Number of transporter(s)?			
4.	Name, Address, and EPA ID Number of designated permitted facility and alternate facilit		_	

(B)

			Yes	No	NI*	Remarks
	5.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				
•	6.	The total quantity of waste(s) and the type and number of containers loaded?				
	7.	Required certification?				
	8.	Required signatures?			,	
C)		es the owner or operator submit ception reports when needed?	<u></u>	N/A	A_AT	THIS TIME
		IV. PRE-TRAM	NSPORT	REQU	IRÉMENT:	<u>S</u>
Α)	and (Re	waste packaged in accord- ce with DOT regulations? equired prior to movement hazardous waste off-site)				
	in con (Re	e waste packages marked and labeled accordance with DOT regulations accerning hazardous waste materials? equired prior to movement of cardous waste off-site)			_	NO WASTE BEING PACKAGED FOR SHIPMENT AT THIS TIME
C)		required, are placards available transporter?			No form	
D)	Pr∈	e-shipment Accumulation:				
	1.	Are containers marked with start of accumulation date?				NO WASTE ON SITE
	2.	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?			~	NO WASTE ON SITE
						-

- 3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?
- 4. If wastes are stored in tanks, are the tanks managed according to the following requirements:
 - a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure.of the tank?
 - b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?
 - c. Do continuous feed systems have a waste-feed cutoff?
 - d. Are required daily and weekly inspections done?
 - e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)
 - f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)
 - g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

WEEKLY INSPECTIONS OF DRUM
AND STORAGE AREA ARE CONDUCTED.

NA STORAGE AREA IS LOCATED

(ATTHIS & 50" FROM PROPERTY LINE, BUT
NO WASTE WAS PRESENT AT THE
TIME OF THE INSPECTION.

N/A___

N/A_

N/A_

N/A

N/A_

		Record the for	lowing	intormation	l :			•
		Tank capacity?		Approximate of the second	gal	lons		
		Tank diameter?		, 400	fee	t		
,	i	Distance of ta	nk from	property 1	ine?	बहर्यक्रा	fe	et
		(see tables 2- Combustible L	l throu iquids	igh 2-6 of N Code - 1977	IEPA's " '" to de	Flammable a termine com	nd pliance)	
,		<u>V Train</u>	ing, Em	nergency Pro	ocedures	<u>.</u>		
				YES NO	NI*	Remarks		
Α.		Personnel training records lude:						
	1.	Job Titles?		<u> </u>		***************************************		
	2.	Job Descriptions?						
	3.	Description of training?				FORMAL	OUTSIDE	TRAINING
	4.	Records of training?					-	
	5.	Have facility personnel received required train-ing by 5-19-81?		/_				
·	6.	Do new personnel receive required training within six months?		N/A				
В.		pardness and Prevention Part 265, Subpart C)						
	1.	Maintenance and Dperation of Facility:		garagement and a second				· · · · · · · · · · · · · · · · · · ·
·		a. Is there any evidence of explosion, or release of hazardous waste or haza waste constituent?	of	, 			· · · · · · · · · · · · · · · · · · ·	

2.	If required, does this facility have the following equipment?	
	a. Internal communications or alarm systems?	
•	b. Telephone or 2-way Radios at the scene of operations?	: '
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	
	Indicate the volume of water and/o	or foam available for fire control
		ER; POSSIBLE USE OF CITY OF
	E. ST. LOUIS WATER S	SUPPLY
3.	Testing and Maintenance of Emergency Equipment:	
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	MONTHLY CHECKS
	b. Is emergency equipment maintained in operable condition?	
4.	Has owner/operator provided immediate access to internal alarms (if needed)?	
5.	Is there adequate aisle space for unobstructed movement?	N/A
Cor	ntingency Plan and Emergency Proced (Part 265, Subpart D)	ure
٠		

C.

٦.	Does the	contingency	y plan
	contain	the following	ng:

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)
- b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?
- c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

VERBAL WORKING AGREEMENTS WITH LOCAL DEPTS.

i	2.	Are copies of the Contingency Plan available at site and local emergency organizations?	
	3.	Emergency Coordinator	
	•	a. Is the facility emergency Coordinator identified? -	
		b. Is coordinator familiar with all aspects of site operation and emergency procedures?	
		c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	
	4.	Emergency	
		If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procdures listed in §265.56?	N/A IN THE CASE OF HAZ. WASTE
-			EPING AND REPORTING 62, Subpart D)
(A)	E> re	re Manifests, Annual Reports, xception Reports, and all test esults and analyses retained for t least three years?	
(B)	Re	as the generator submitted Annual eports and Exception Reports as equired?	N/A ATTHIS TIME
			NATIONAL SHIPMENTS 62 Subpart E)
(A)		das the installation imported or exported hazardous waste?	

	(If A was answered Yes, then complete	the following as	applicable.)	
1.		orting Hazardous waste, a generator:		•	
	a.	Notified the Administrator in writing?	N/A		
	b.	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<i>N/A</i>	i .	
	с.	Met the Manifest requirements?			
2.		orting Hazardous Waste,			

VIII. Remarks

Met the manifest requirements?

PRINCE AT THE TIME OF THE INSPECTION, NO HAZARDOUS WASTES WERE POINT BEING GENERATED. HAZARDOUS WASTE IS GENERATED AT THE FACILITY WHEN CERTAIN PRODUCTS ARE PRODUCED. DUE TO THIS RANDOM GENERATION, DNLY TWO (2) SHIPMENTS OF WASTE HAVE LEFT THE SITE (JULY 23.AND AUGUST 5). PROPER DATING HAD LABELING OF THE CONTAINERS COULD NOT BE CHECKED DUE TO THE LACK OF WASTE. NO TANK STORAGE IS UTILIZED. THE SAFETY DIR AND ENVIR. TECH. HAVE RECEIVED FORMAL CLASSROOM INSTRUCTION IN THE MANAGEMENT OF HAZ. WASTE OUTSIDE THE FACILITY. NO OTHER PERSONNEL HANDLE THE HAZ. WASTE. PAPER WORK REGARDING MANIFESTS, CONTINGENCY PLAN, SAFETY, AND TRAINING WERE REVIEWED AND APPEARED TO MEET THE REQUIREMENTS OF 40 CFR 262.